

TSD File Inventory Index

Date July 20, 2004

Initial CMK/ewc

Facility Name <u>Lockheed Martin Tactical Defense</u>	
Facility Identification Number <u>NUD 000 823 914</u>	
A.1 General Correspondence <u>A.1.3</u>	B.2 Permit Docket (B.1.2)
A.2 Part A / Interim Status <u>A.2</u>	1 Correspondence <u>B.1.1-B.1.8</u>
1 Correspondence	2 All Other Permitting Documents (Not Part of the ARA) <u>B.1.2</u>
2 Notification and Acknowledgment	C.1 Compliance - (Inspection Reports)
3 Part A Application and Amendments	C.2 Compliance/Enforcement
4 Financial Insurance (Sudden, Non Sudden)	1 Land Disposal Restriction Notifications
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5 RFI QAPP	7 Lab data Soil Sampling/Groundwater
6 RFI QAPP Correspondence	8 Progress Reports
7 Lab Data Soil Sampling/Groundwater <i>See D.2.1</i>	D.5 Corrective Action/Enforcement
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9 Interim Measures Correspondence	2 Other Non-AR Documents
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6 CMS Progress Reports	1 Human/Ecological Assessment
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2 CMI Workplan	5 Permitting
3 CMI Program Reports and Oversight	6 Corrective Action Remediation Study
4 CMI Draft/Final Reports	7 Corrective Action/Remediation Implementation
5 CMI QAPP	8 Endangered Species Act
6 CMI Correspondence	9 Environmental Justice

Note Transmittal Letter to Be Included with Reports
Comments _____

B.1.1



Minnesota Pollution Control Agency

520 Lafayette Road, Saint Paul, Minnesota 55155-3898

Telephone (612) 296-6300



October 23, 1990

MND000
823914

RECEIVED
OCT 26 1990

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Mr. Mark Wilson
Environmental Engineer
Unisys Corporation
P.O. Box 64525
Saint Paul, Minnesota 55164-0525

Dear Mr. Wilson:

RE: Revised Contingency Plan
Unisys Corporation - 3333 Pilot Knob (Facility) and
1200 Trapp Road (Generator)
Eagan, Minnesota

The Minnesota Pollution Control Agency (MPCA) staff have reviewed your revised Contingency Plan submitted October 2, 1990, applicable to the two locations referenced above. The revision to the Contingency Plan was necessary due to personnel changes. This letter constitutes the MPCA's approval of the revised Contingency Plan which will supersede the July, 1989 version.

Pursuant to Minn. Rules pt. 7045.0466, subp. 5, items A and B (1989), a copy of the October 2, 1990, revised Contingency Plan must be maintained at each location and submitted to all local officials that may be called upon to provide emergency services.

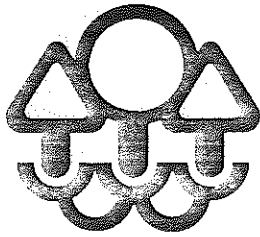
Questions pertaining to this approval may be directed to Dan Card of my staff at 612/642-0421.

Sincerely,

Bruce W. Brott, P.E., Supervisor
Permit and Review Unit
Regulatory Compliance Section
Hazardous Waste Division

BWB:mk

cc: Charles Slaustas, U.S. Environmental Protection Agency, Chicago
Joel Morbito, U.S. Environmental Protection Agency, Chicago



Minnesota Pollution Control Agency

520 Lafayette Road, Saint Paul, Minnesota 55155

Telephone (612) 296-6300



October 06, 1989

RECEIVED
OCT 10 1989

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

Mr. Roger Martin
Unisys
P.O. Box 64525
St. Paul, Minnesota 55164-0525

Dear Mr. Martin:

RE: Unisys Hazardous Waste Storage Facility Permit
EPA ID No. MND000823914
Minor Modification Number 1

The revisions which you submitted to the Minnesota Pollution Control Agency (MPCA) on September 10, 1989, have made the requested Unisys permit modifications acceptable. The minor modifications to the RCRA permit are hereby approved. These modifications were submitted in your letters of February 14, 1989, July 19, 1989, and September 10, 1989, and include but are not limited to:


1. Modifying the contingency plan;
2. Replacing underground tanks with in-room secondary containment;
3. Deleting information specific to other Unisys facilities;
4. Updating the closure plan to include information about closing the former secondary containment tanks;
5. Updating the personnel training procedures;
6. Submitting more legible drawings of the location of fire suppression systems; and
7. Replacing the name "Sperry" with "Unisys" throughout.

This permit has been modified pursuant to Minn. Stat. Chs. 115 and 116 and Minn. Rules pts. 7001.001 to 7001.0730 and 7045.0020 and 7045.1260. The modified permit remains effective until October 1, 1990.

Mr. Roger Martin
Page Two

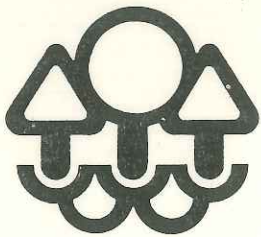
If you have any questions regarding this permit please call Kevin Veach at 612/296-8582.

Sincerely,


Richard A. Svanda
Director
Hazardous Waste Division

RAS:jcj

cc: Charles Slaustas, EPA, Chicago
Joel Morbito, EPA, Chicago



Minnesota Pollution Control Agency

520 Lafayette Road, Saint Paul, Minnesota 55155

Telephone (612) 296-6300



RECEIVED

AUG 28 1989

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

August 23, 1989

Mr. Roger Martin
Unisys
P.O. Box 64525
St. Paul, Minnesota 55164-0525

Dear Mr. Martin:

RE: Unisys Part Hazardous Waste Facility
MND000823914

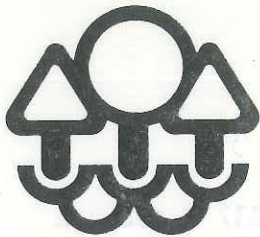
The changes made to the Unisys Park application for a permit modification are acceptable with two exceptions. On pages 160 and 184 the telephone number 612/296-7373 is referenced. In both cases the telephone number should be changed to 612/296-8100. When these changes have been received, the Minnesota Pollution Control Agency will issue the permit modification. Please submit the revised pages by September 11, 1989.

Sincerely,

Kevin C. Veach
Permit and Review Unit
Hazardous Waste Section
Hazardous Waste Division

KCV/df

cc: Mr. Charles Slaustas, EPA, Region 5, Chicago



Minnesota Pollution Control Agency

520 Lafayette Road, Saint Paul, Minnesota 55155

Telephone (612) 296-6300



PT. B

May 23, 1989

RECEIVED
MAY 25 1989

Mr. Roger J. Martin
Unisys
P.O. Box 64525
St. Paul, Minnesota 55164-0525

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Dear Mr. Martin:

RE: Unisys Park, Hazardous Waste Facility, MND000823914

This letter will summarize the conclusions we reached on May 10, 1989, regarding modifications to the Unisys Park hazardous waste permit. Because your submittal of February 14, 1989, updated procedures throughout several sections of the permit application, I have reviewed the entire document.

On page 76, section D-3, will clarify where secondary containment is provided in-room or by tanks or by piping to the wastewater pretreatment system.

On page 84 you will evaluate whether any procedures parallel to those described in this section are relevant for Unisys Park and provide revisions or additional material where appropriate.

The drawing on page 96 or page 97 will be revised to clarify what is stored in room 4. The drawing on page 96 will be corrected to show that the caustic drain lines are separate from the acid drain lines. Also, you agreed to provide a description of the containment measures which would prevent spilled cyanide from mixing with acidic waste.

On page 109 section 2.1.6 will be changed to reflect the in-floor secondary containment for the solvents rooms and will list the secondary containment capacities for those rooms.

On pages 111 and 113 references to the underground containment tanks will be deleted.

You agreed that more specific language will be added, probably to section 5 of the ECP 37009-1 on page 159, which describes how Unisys will report releases immediately to the regulatory agencies in compliance with Minn. Rules pt. 7045.0468, subp. 5 A and B and subp. 6.

We agreed that on page 160 a statement could be added that after the immediate emergency response all hazardous waste will be treated, stored or disposed consistent with Minn. Rules pts. 7045.0100 - 7045.0544. Also, several typographical errors will be corrected.

Mr. Roger J. Martin

Page 2

You agreed to provide more legible information to replace pages 237 P through 237 II, to meet the requirements of Minn. Rules pt. 7045.0466, subp. 4.E.

Finally, as we discussed on May 11, the closure plan which begins on page 412 may require revision. If hazardous wastes have contaminated the secondary containment tanks, the closure plan will require description of steps for tank decontamination clean up of any contaminated soil. If necessary, this could be requested via a compliance schedule in the modified permit.

If you have questions or comments on any of this, please call me at 612/296-8582.

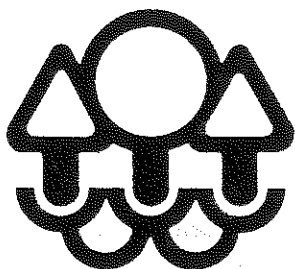
Sincerely,



Kevin C. Veach
Permit and Review Unit
Hazardous Waste Section
Hazardous Waste Division

KCV:pt

cc: Charles Slaustas, U.S. Environmental Protection Agency, Chicago
Joel Morbito, U.S. Environmental Protection Agency, Chicago



Minnesota Pollution Control Agency

RECEIVED
JAN 24 1989

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

January 20, 1989

Mr. Roger Martin, Manager
Environmental Management
Unisys Corporation
P.O. Box 64525
St. Paul, Minnesota 55164-0525

Dear Mr. Martin:

RE: Contingency Plan for the Hazardous Waste Storage Permit, Unisys Park
MND000823914

As we discussed in our December 30, 1988, phone conversation, your recent revision to the contingency plan is regarded as an application for a minor modification to the facility hazardous waste permit under Minn. Rules pt. 7001.0730, Subp. 4. As such, the revision must be approved by the Minnesota Pollution Control Agency (MPCA). The Unisys Environmental Control Procedure (ECP), which constitutes the majority of the facility's Contingency Plan, is a well thought out and comprehensive document. However, in order to be complete and consistent with the Minnesota hazardous waste rules several changes in the plan are required.

1. The location of fire extinguishers and the description and location of the fire suppression system must be provided as required in Minn. Rules pt. 7045.0466, Subp. 4.E.
2. The four prefatory pages of section G of the Part B application should be updated to:
 - a) refer to the appropriate pages, section, and appendices of the revised ECP;
 - b) reflect the date of their current revision; and
 - c) refer on page 153 to the appropriate Minnesota hazardous waste rules instead of the federal rules.
3. For clarity all references to the Code of Federal Regulations (CFR) 264 and 265 should be changed to references to the appropriate Minnesota rules because Minnesota carries out the RCRA program under its own rules.
4. The pages in the ECP may be more easily referenced if they are consecutively numbered.

Phone: _____

520 Lafayette Road, St. Paul, Minnesota 55155
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Mr. Roger Martin

Page 2

5. Section 6 of ECP 37009-1 should refer to the reporting requirements of Minn. Rules pt. 7045.0468, Subps. 5 and 6 or describe them in detail. The statement of section 6.2 is too general to serve the purpose.
6. Section 6.4 of the ECP 37009-1 should refer to Minn. Rules pt. 7045.0470, Subp. 3, instead of the CFR.
7. Post-emergency responses should be described in greater detail. The description should show how Unisys will comply with Minn. Rules pts. 7045.0470 and 7045.0450, Subp. 3.J. For example, foam-covered containment of spilled ignitable liquids in a diked area is only acceptable as an immediate response to a spill. Thereafter the spill must be properly containerized, stored and the residues removed from the spill area in accordance with all the applicable generator and storage facility requirements. These types of actions should be described.
8. Section 7.8 of the ECP 37009-1 should refer to the MPCA Commissioner instead of the EPA Regional Administrator.
9. Unisys should submit copies of the current letters transmitting the contingency plan to the emergency services. These will replace the existing letters in Appendix G-2 of the Contingency Plan.

Most of the changes required above are also relevant to the Shepard Road facility since the ECP document covers that facility also. With the exception of specific references to page numbers, the content of this letter should be used to modify the Shepard Road facility Contingency Plan. Thomas B. Townsend of the Permit and Review Unit has agreed to this process and will carry out the minor modification of the Unisys Shepard Road permit. A copy of the revised Shepard Road facility Contingency Plan should be submitted to Mr. Townsend. The revised Unisys Park facility Contingency Plan should be submitted to me. Please submit the revised contingency plans by February 13, 1989. Once the revisions are reviewed, you will receive letters from the MPCA approving the minor modifications to the two facility permits. If you have any questions, please call me at 612/296-8582.

Sincerely,



Kevin C. Veach
Permit and Review Unit
Hazardous Waste Section
Hazardous Waste Division

KCV:kag

cc: Charles Slaustas, U.S. Environmental Protection Agency, Chicago
Payloa Wright, U.S. Environmental Protection Agency, Chicago



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF

5H-12

SEP 22 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Ellen J. Jurczak, P.E.
Permits Manager
Safety - Kleen Corporation
777 Big Timber Road
Elgin, IL 60123

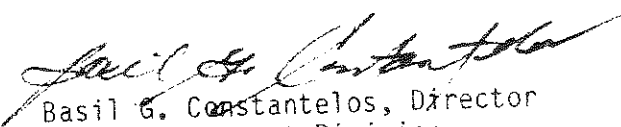
RE: Safety - Kleen
MND 981953045

Dear Ms. Jurczak:

Enclosed is a copy of the Federal portion of the Resource Conservation and Recovery Act (RCRA) Permit for the above-referenced facility. The RCRA Permit contains both Federal permit conditions (contained herein) and State permit conditions, which were issued separately by the State of Minnesota RCRA program authorized under 40 CFR Part 271. When both this portion and the State permit are effective, Safety-Kleen has an effective RCRA Permit authorizing only those hazardous waste management activities specified in the RCRA Permit.

This permit is effective September 22, 1988. The permit will remain valid through the fifth anniversary of the effective date, unless the permit is modified, revoked and reissued, or terminated pursuant to 40 CFR 270.40-270.43. Failure by your company to comply with any condition of the permit may result in civil and/or criminal penalties.

Sincerely,


Basil G. Constantelos, Director
Waste Management Division

Enclosure

cc: Larry Christensen
Minnesota Pollution Control Agency

436-8

SHR-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Ellen J. Jurczak, P.E.
Permits Manager
Safety - Kleen Corporation
777 Big Timber Road
Elgin, IL 60123

RE: Safety - Kleen
MND 981953045

Dear Ms. Jurczak:

Enclosed is a copy of the Federal portion of the Resource Conservation and Recovery Act (RCRA) Permit for the above-referenced facility. The RCRA Permit contains both Federal permit conditions (contained herein) and State permit conditions, which were issued separately by the State of Minnesota RCRA program authorized under 40 CFR Part 271. When both this portion and the State permit are effective, Safety Kleen has an effective RCRA Permit authorizing only those hazardous waste management activities specified in the RCRA Permit.

This permit is effective today, _____. The permit will remain valid through the fifth anniversary of the effective date, unless the permit is modified, revoked and reissued, or terminated pursuant to 40 CFR 270.40-270.43. Failure by your company to comply with any condition of the permit may result in civil and/or criminal penalties.

Sincerely,

Basil G. Constantelos, Director
Waste Manage Division

Enclosure

cc: Larry Christensen
Minnesota Pollution Control Agency

RCRA PERMITS	TYP	AUTH.	IL. CHIEF	IN. CHIEF	MI. CHIEF	MD CHIEF	OH. CHIEF	RPB CHIEF	O.R. A.D.D.	WMD DIR
INIT. DATE	<i>Judy</i>	<i>AD</i>				<i>Constantelos</i>			<i>Wen. today 9/16/88</i>	<i>MP</i>

8/25/88 8-31-88

436 8

EP 9-16-88

RESPONSE TO COMMENTS REGARDING THE RESOURCE CONSERVATION AND RECOVERY ACT
(RCRA) HAZARDOUS WASTE MANAGEMENT FACILITY PERMIT TO BE ISSUED TO
SAFETY-KLEEN CORPORATION

INTRODUCTION

This response is issued pursuant to 40 Code of Federal Regulations (CFR) Section 124.17, which requires that any changes of draft permit conditions be specified along with the reason for the change; that all significant comments be described and responded to; and that any documents cited in the response be included in the administrative record. Comments were requested on U.S. EPA's tentative determination of conformity with corrective action requirements under the Hazardous and Solid Waste Amendments (HSWA) of 1984.

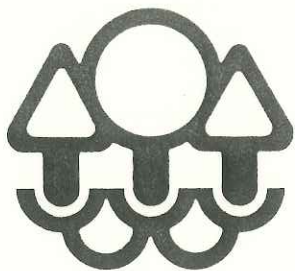
The 45-day public comment period commenced on July 25, 1988, with public notices in the Star Tribune and the Fridley Focus as well as a radio announcement on a local station KSTP-A.M. The termination date of this comment period, was September 8, 1988. No written comments were received concerning conditions of the Federal permit.

Additionally, pertinent information and materials were available at the Anoka County Library in Blaine, Minnesota.

DETERMINATION

Based on its review of the application materials, and pertinent regulations, the United States Environmental Protection Agency (U.S. EPA) determined that revision and/or clarification of the permit is not necessary.

436-8



Minnesota Pollution Control Agency

October 2, 1985

RECEIVED

OCT 4 1985

SWB - AIS
U.S. EPA, REGION V

Mr. Roger J. Martin
Environmental Manager
Sperry, Sperry Park Facility
P.O. Box 64525, M.S. UIN14
St. Paul, Minnesota 55164

Dear Mr. Martin:

RE: Hazardous Waste Permit Issuance
Sperry, Sperry Park Facility
MND000823914

Enclosed is a copy of the Minnesota Pollution Control Agency (MPCA) Hazardous Waste Storage Permit for your Sperry Park facility which is located in the City of Eagan, Dakota County, Minnesota.

This permit has been prepared pursuant to Minnesota Statutes Chapters 115 and 116 and Minn. Rules pts. 7000.1700, 7001.0010-.0730, and 7045.0100-.1260. The permit is effective on the date of issuance for a period of five years or until terminated, revoked, or amended by the MPCA.

Should you have any questions regarding this permit, please contact Mr. Steven A. Reed of my staff at 612/296-7786.

Sincerely,

Dale L. Wikre
Director
Solid and Hazardous Waste Division

DLW:cj

Enclosures

cc: Ron Spong, Dakota County Community Health Services, Hastings
Charles Slaustus, U.S. Environmental Protection Agency, Chicago
Joel Morbito, U.S. Environmental Protection Agency, Chicago
Phone: 612/296-7282

COPY 2

1935 West County Road B2, Roseville, Minnesota 55113-2785

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Minnesota Pollution Control Agency

July 24, 1985

TO WHOM IT MAY CONCERN


Re: Sperry Corporation, Eagan, Minnesota Hazardous Waste Permit

The Minnesota Pollution Control Agency (MPCA) hazardous waste rules require the aforementioned facility to obtain a hazardous waste permit. This hazardous waste permit will ensure compliance with State and federal regulations regarding the safe management of hazardous waste at the facility.

We have enclosed the fact sheet and the public notice for this facility for your information.

Should you have any questions, please do not hesitate to contact Mr. Ross Ohman of my staff at 612/296-7280.

Sincerely,


Steven A. Reed, P.E., Supervisor
Hazardous Waste Permit and Review Unit
Regulatory Compliance Section
Solid and Hazardous Waste Division

SAR/dmc

Enclosure

RECEIVED

AUG 05 1985

SOLID WASTE BRANCH
U.S. EPA, REGION V

Phone: _____

1935 West County Road B2, Roseville, Minnesota 55113-2785

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Equal Opportunity Employer



allent

JUL 24 1985

5HS-13

Mr. Steve Reed
Minnesota Pollution Control Agency
1935 West County Road B-2
Roseville, MN 55113

RE: Corrective Action Response Review
Sperry Corporation-Sperry P. Facility
Eagan, Minnesota
MND 000-823-914

Dear Mr. Reed:

Enclosed is a copy of information we received from the referenced facility, addressing the "continuing release" provisions of the Hazardous and Solid Waste Amendments of 1984. Please review this information, and complete the enclosed form entitled "RCRA Facility Review for Solid Waste Management Units." We also encourage you to provide us any and all additional information that is pertinent to a consideration of continuing releases at this facility. We will take no final actions concerning this facility without your full participation in the decision-making process.

We ask that you return the completed form, plus any additional information to us (1) within two weeks of your receipt of this letter, for facilities which have indicated "no releases", and (2) within four weeks for facilities which have indicated prior or continuing releases of any kind.

Please feel free to call the previously identified permit writer during the progress of your review with any questions or comments.

Sincerely yours,

Edith M. Ardiente, P.E.
Chief, Technical Programs Section

Enclosure(s)

5HS-13:A.Debus:jt:6/24/85

4K 7/24/85

INT. DATE	TYP.	AUTH.	IL CHIEF	IN. CHIEF	MI. CHIEF	MN/WI CHIEF	SH. CHIEF	TPS CHIEF	WMS CHIEF	WSPR CHIEF
7/23/85	J. J. Smith	7/23/85				AD	Stewart	7/24/85	7/24/85	

Gus - Please file - AD.

5HS-13

JUN 26 1985

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Mr. Roger J. Martin, Env. Manager
Sperry Univac DSD
P.O. Box 3525
St. Paul, MN 55165

Re: Corrective Action Requirements,
Hazardous and Solid Waste
Amendments of 1984

Dear Mr. Martin:

Sperry Univac DSD
MND 000-823-914

As you know, we are currently reviewing Part B of the Resource Conservation and Recovery Act (RCRA) permit application for the above-referenced facility.

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the Amendments) were enacted to modify RCRA. Under Section 206 (copy enclosed) of the Amendments, all RCRA permits issued after the date of enactment must provide for corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. Please note that both hazardous and non-hazardous waste can meet the definition of solid waste under 40 CFR 261.2.

Consequently, we must determine whether such releases have ever occurred at the facility site. If they have, we must ensure that corrective actions either have been taken, or will be taken, pursuant to a RCRA permit. An important part of our determination includes your willingness (or unwillingness) to sign the enclosed certification statement. Please read it carefully, and either sign it and return it, or return it to us unsigned with a cover letter of explanation, within three weeks of the date of this letter. Any information regarding releases of hazardous waste or hazardous constituents to the environment will be evaluated during the permit review process. Any tentative decision we make concerning your permit application will be public noticed in a newspaper of general circulation in the area of the facility.

Please contact the previously identified permit writer with our Agency for additional information.

Sincerely yours,

David Stringham

David A. Stringham, Acting Chief
Solid Waste Branch

Enclosures

217-10

W.K. 6/20/85

TYP.	AUTH.	IL CHIEF	IN. CHIEF	OL. CHIEF	NN/WI CHIEF	OH. CHIEF	TPS CHIEF	WMB CHIEF	WMD DIR
J. Turner 6/24/85	AD 6/26/85				CBT 6/26/85		Jan 6/25/85		

Shelma

5HS-13

JUN 04 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Rober J. Martin, Environmental Manager
Sperry Univac DSD
P.O. Box 3225
St. Paul, MN 55165

Re: Corrective Action Requirements,
Hazardous and Solid Waste
Amendments of 1984
Sperry Univac DSD
MND 000-823-922

Dear Mr. Martin:

As you know, we are currently reviewing Part B of the Resource Conservation and Recovery Act (RCRA) permit application for the above-referenced facility.

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the Amendments) were enacted to modify RCRA. Under Section 206 (copy enclosed) of the Amendments, all RCRA permits issued after the date of enactment must provide for corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. Please note that both hazardous and non-hazardous waste can meet the definition of solid waste under 40 CFR 261.2.

Consequently, we must determine whether such releases have ever occurred at the facility site. If they have, we must ensure that corrective actions either have been taken, or will be taken, pursuant to a RCRA permit. An important part of our determination includes your willingness (or unwillingness) to sign the enclosed certification statement. Please read it carefully, and either sign it and return it, or return it to us unsigned with a cover letter of explanation, within three weeks of the date of this letter. Any information regarding releases of hazardous waste or hazardous constituents to the environment will be evaluated during the permit review process. Any tentative decision we make concerning your permit application will be public noticed in a newspaper of general circulation in the area of the facility.

Please contact the previously identified permit writer with our Agency for additional information.

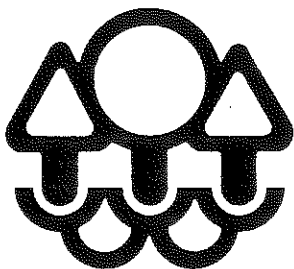
Sincerely yours,

David Stringham
David A. Stringham, Acting Chief
Solid Waste Branch

217-14

Enclosures

INITIALS	DATE	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
		<i>A. Jurne</i>	<i>Smith</i>		<i>MS/WST</i>		<i>6/3/85</i>		
		<i>5/30/85</i>	<i>6/3/85</i>		<i>6/3/85</i>		<i>6/4/85</i>		



Minnesota Pollution Control Agency

May 23, 1985

RECEIVED

MAY 29 1985

SOLID WASTE DIVISION
U.S. EPA, REGION V

Mr. Roger J. Martin
Sperry, Sperry Park Facility
3333 Pilot Knob Road
Eagan, Minnesota 55121

Dear Mr. Martin:

Re: Sperry Draft Hazardous Waste Permit
MND000823914

Please find enclosed a Draft Hazardous Waste Storage Permit for the above referenced facility. To avoid possible delays before the public notice period we request you review this document and address your concerns in writing before June 3, 1985 to:

Mr. Ross Ohman
Minnesota Pollution Control Agency
1935 West County Road B-2
Roseville, Minnesota 55113-2785

Please understand this document may be revised during the review period before the public notice. If you have any questions, please do not hesitate to contact Mr. Ross Ohman of my staff at 612/296-7280.

Sincerely,

Steven A. Reed, P.E.
Supervisor, Hazardous Waste Permit and Review Unit
Regulatory Compliance Section
Solid and Hazardous Waste Division

SAR/RL0:jal

cc: Mr. Greg Lee, Ramsey County
Mr. Charles Slaustus, U.S. EPA, Chicago
Ms. Rose Freeman, U.S. EPA, Chicago
Mr. Lee Paddock, Attorney General, MPCA

Phone: 612/296-7280

1935 West County Road B2, Roseville, Minnesota 55113-2785

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Equal Opportunity Employer

OCT 04 1985

Mr. Steven A. Reed, P.E.
Hazardous Waste Permit and
Review Unit
Regulatory Compliance Section
Solid and Hazardous Waste Division
Minnesota Pollution Control Agency
1935 West County Road B-2
Roseville, MN 55113 - 2785

RE: The Sperry Corporation
MND 000-823-914

Dear Mr. Reed:

My staff has reviewed the information concerning the possible need for corrective action at the The Sperry Corporation of Eagan, Minnesota, and has concluded that the facility is not environmentally significant. A copy of the initial screening form used for the Review is enclosed with this letter. We concur with your findings that no releases have occurred from the facility and that no solid waste management units exist, other than the reported wastewater treatment system.

In addition, we concur with the provisions of the hazardous waste permit which was public noticed by the Minnesota Pollution Control Agency (MPCA) on August 1, 1985, for the above-referenced facility. Therefore, your organization may proceed with issuance of a state permit to this facility. A federal permit decision which affirms that corrective action for past or existing releases of hazardous wastes or constituents is not necessary and shall be issued in the near future. In addition, our decision will affirm the need for waste minimization by the Permittee.

If you have any questions on these or related issues please contact Mr. Allen A. Debus of my staff at (312) 886-6186.

Sincerely yours,

Edith M. Ardiente, P.E.
Chief, Technical Program Section

Enclosure

9/25/85

SHS-13

Mr. Steven A. Reed, P.E.
Hazardous Waste Permit and
Review Unit
Regulatory Compliance Section
Solid and Hazardous Waste Division
Minnesota Pollution Control Agency
1935 West County Road B-2
Roseville, MN 55113 - 2785

RE: The Sperry Corporation
MND 000-823-914

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In addition, we concur with the provisions of the hazardous waste permit which was public noticed by the Minnesota Pollution Control Agency (MPCA) on August 1, 1985, for the above-referenced facility. Therefore, your organization may proceed with issuance of a state permit to this facility. A federal permit decision which affirms that corrective action for past or existing releases of hazardous wastes or constituents is not necessary shall be issued in the near future. In addition, our decision will affirm the need for waste minimization by the Permittee.

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Sincerely yours,

Edith M. Ardiente, P.E.
Chief, Technical Program Section

Enclosure

SHS-13:A.Debus:jt:9/23/85

	TYP.	AUTH.	IL CHIEF	RM CHIEF	MR. CHIEF	ADM/WH CHIEF	CM. CHIEF	TCS CHIEF	WWS CHIEF	WWS DIR
INT. DATE	J. Turner	Edith M. Ardiente				9/25/85		10/1/85		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HS-13

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Roger J. Martin
Manager, Environmental Management
Sperry Corporation
Defense Production Group
Sperry Park, P.O. Box 64525
St. Paul, Minnesota 55169-0525

RE: Hazardous Waste Facility
Permit for Sperry,
Defense Systems Division
Eagan, Minnesota
MND 000-823-914

Dear Mr. Martin:

The purpose of this letter is to inform you that pursuant to the Solid and Hazardous Waste Amendments of 1984 (HSWA), permit provisions concerning waste minimization and corrective action for past or continuing release, are necessary. Since the Minnesota Pollution Control Agency (MPCA) is not yet authorized to implement the provisions of HSWA, the U.S. Environmental Protection Agency (U.S. EPA) retains the authority to implement these provisions.

On July 10, 1985, Sperry Corporation certified to the U.S. EPA and MPCA that no solid waste management units, other than those that were the subject of the draft hazardous waste permit public noticed by MPCA on August 1, 1985, exist at the facility. The public notice solicited information from the public regarding any solid waste management units or releases of hazardous waste or constituents from such units at this facility. No comments were received from the public concerning this matter.

Therefore, this letter should be considered a permit decision that, based on the Permittee's certification dated July 10, 1985, no corrective action for past or continuing releases of hazardous wastes or constituents is required.

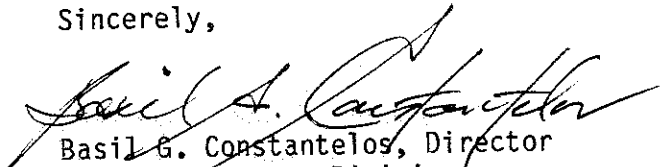
However, the Permittee must inform the U.S. EPA of any deviations from, or changes in, the information concerning solid waste management units and/or releases which would affect the Permittee's ability to comply with applicable federal regulations.

In addition, pursuant to 40 CFR 264.73(b)(9), the Permittee's operating record shall contain a certification by the Permittee no less often than annually, that the Permittee has a program in place to reduce the volume and toxicity of hazardous waste that he generates to the degree determined by the Permittee to be economically practicable; and the proposed method of treatment, storage or disposal is that practicable method currently available to the Permittee which minimizes the present and future threat to human health and the environment.

This permit decision is effective this date and shall remain in effect until October 1, 1990, unless revoked and reissued, or terminated.

Since MPCA issued a hazardous waste permit to your organization for this facility on October 2, 1985, this permit decision, together with the MPCA permit, constitutes a Resource Conservation and Recovery Act permit and terminates interim status for this facility.

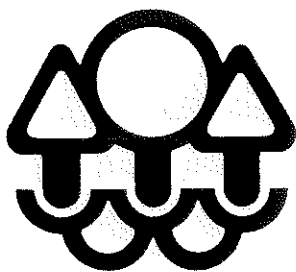
Sincerely,



Basil G. Constantelos, Director
Waste Management Division

cc: Mr. Steven A. Reed
Minnesota Pollution Control Agency

Mr. Thomas J. Kalitowski
Executive Director
Minnesota Pollution Control Agency



Minnesota Pollution Control Agency

April 26, 1985

RECEIVED

APR 29 1985

Mr. Roger Martin, Environmental Manager
Sperry, DSS Sperry Park
P.O. Box 64525, MS U1N14
St. Paul, Minnesota 55164

SOLID WASTE BRANCH
U.S. EPA, REGION V

Dear Mr. Martin:

Re: Technical Adequacy, Sperry, DSS Sperry Park
MND000823914

We have completed technical review of the Part B application for a hazardous waste facility permit for the referenced facility. Review of the information submitted and a site inspection indicate that the facility is in compliance with applicable design and operation standards set forth in Minn. Rules Parts 7045.0450 - 7045.0544. Therefore, we will be preparing a draft hazardous waste facility permit for the facility.

We intend to provide you with an opportunity to review the draft permit prior to placing it on public notice.

If you have any questions regarding the Part B permit application and its review, please contact Mr. Ross Ohman of my staff at 612/296-7280.

Sincerely,

Steven A. Reed, Supervisor
Hazardous Waste Permit and Review Unit
Regulatory Compliance Section
Solid and Hazardous Waste Division

SAR/RLO:ch

4

cc: Ms. Rose Freeman, U.S. Environmental Protection Agency, Chicago
Mr. Ron Spong, Dakota County, Hastings
Mr. Allen Debus, EPA, Chicago

Phone: _____

1935 West County Road B2, Roseville, Minnesota 55113-2785

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SPERRY CORPORATION
DEFENSE PRODUCTS GROUP
SPERRY PARK, P.O. BOX 64525
ST. PAUL, MINNESOTA 55164-0525
TELEPHONE (612) 456-2222

December 13, 1984

RECEIVED

JAN 02 1985

WMD-RAIU
EPA, REGION V

RECEIVED

DEC 24 1984

WASTE MANAGEMENT
BRANCH

Mr. Kenneth Skahn
U.S. Environmental Protection Agency
Region V
230 South Dearborn St.
Chicago, IL 60604

Re: Part B Permit Application, Sperry Corporation
Sperry Park Facility MND000823914

Dear Mr. Skahn:

Enclosed are revisions to our Part B permit application for our Sperry Park facility which were requested by Ross Ohman, of the MPCA, in a telephone conversation with Dan MacDonald of Sperry. These changes are labelled revision "C".

Item #1, Title Page: The Corporate name has been changed. The revisions on this page reflect this name change.

Item #2, Page #6: A sentence has been added to this page to reflect our latest name change.

Item #3, Page #11: D004 was added to line #11 (Oil) to reflect arsenic contamination in this oil and line 16 was added to include waste PCB's which were inadvertently omitted from this page in previous revisions.

Item #4, Page #29: Pretreatment rinse water was listed twice on this page. These listings were removed because they do not apply in this section.

Item #5, Page #33: Hazardous Waste Code numbers were added for PCB's and Oil, NOS. Also the lab waste entry rationale was completed.

Item #6, Page #66: The MPCA number was added to this page. Also the listing on PCB's in the composition section has been changed to read "greater than 50 ppm".

COPY 1

Mr. Kenneth Skahn
December 13, 1984
Page 2

Item #7, Pages 70 and 71: These two pages will be deleted because the pretreatment system does not apply to this report.

Item #8, Page 74: Pretreatment rinse water and treated cyanide were removed from this list because they do not apply to this report.

Item #9, Pages 423 and 424: These two pages have been replaced due to changes in the Shepard Road closure cost estimates. This also changes the total closure cost on page 424.

These revisions are numbered so they may be inserted in the appropriate place in the original application. All of these changes are shown as revision "C".

We are sending two copies of these revisions to you and two copies to Mr. Steven Reed of the MPCA.

Sincerely

SPERRY

A handwritten signature in cursive script, appearing to read "Roger J. Martin".

Roger J. Martin
Manager
Environmental Management

Enclosure

/lmk

DEC 03 1984

5HW-13

Mr. Steven A. Reed
Minnesota Pollution Control Agency
Solid and Hazardous Waste Division
1935 West County Road B-2
Roseville, Minnesota 55113

RE: Sperry Computer Systems
Eagan, Minnesota
MND 000-823-914

Dear Mr. Reed:

We have determined that the RCRA Part B permit application for the above-referenced facility is complete. We are enclosing a copy of our letter to the facility advising them of this determination.

We now ask that you perform a detailed technical evaluation of the application materials to ensure conformance with all applicable 40 CFR Part 264 standards. Please have the permit writer assigned to this facility forward us a copy of any comments he/she has. In order to avoid duplication and/or confusion when corresponding with the facility, we would like the opportunity to provide comments to the permit writer and to then consolidate all comments into one letter. Please forward your Agency's "first-round" comments to us by January 31, 1985.

If you have any questions or comments in the meantime, please call Jodi Feld of my staff, at (312) 886-6192.

Sincerely yours,

ORIGINAL SIGNED BY
WILLIAM H. MINER
William H. Miner, Chief
Technical, Permits, and Compliance Section
Waste Management Branch

Enclosure

cc: Ross Ohman, MPCA

bcc: Ken Skahn, MN SIO
Rich Dell, MN SS

5HW-13:JFeld:PGrace:11-30-84

217-12

INITIALS	TYPIST	AUTHOR	STU #1	STU #2	STU #3	IPS	WMB	WMO
	PH	JF	CHIEF	CHIEF	CHIEF	CHIEF	CHIEF	CHIEF
DATE	11-30-84	11-30-84		DJB		WMB		
				12-3-84		12/3/84		

Nov 28 1984

5HW-13

Mr. Roger Martin
Environmental Manager
Sperry Computer Systems
Sperry Park Facility
P.O. Box 64525 M.S. UINI4
St. Paul, Minnesota 55164

RE: Notice of Completeness
Sperry Computer Systems
Eagan, Minnesota
U.S. EPA ID #: MND 000-823-914

Dear Mr. Martin:

We have received your response to the questions posed in our September 6, 1984, letter to you regarding completeness deficiencies in the Part B application. The "completeness review" is an initial review to check for completeness of your application against a list of required information delineated under 40 CFR 270.14 through 270.29. In responding to the questions, we now find your application complete.

The completeness review is not a technical review. We now begin an "adequacy review" during which we analyze the technical aspects of the application in depth, in order to make a tentative decision to either prepare a draft permit or deny the permit application. During our completeness review, it was apparent that the permit application has a number of technical deficiencies. During the adequacy review, Sperry will be required to provide technical information that is sufficient to demonstrate the facility complies with all applicable requirements of 40 CFR Part 264. If the necessary information is not provided, the decision will be made to deny the permit at which time interim status will be revoked.

Subsequent to the decision to prepare a draft permit or deny the permit application, either the draft permit or notice of intent to deny the application will be public noticed. The public notice will allow for public comment and provide an opportunity for public hearing. A final permit decision will be made either by this Agency or the Minnesota Pollution Control Agency (MPCA). The MPCA will make the final decision if, during the permit review process, this Agency provides final authorization to the MPCA to administer a State hazardous waste program in lieu of the Federal program.

217-11

We will be working cooperatively with the MPCA throughout the course of this review. Please understand that either, or both, of our Agencies may request additional information from you. In responding to such requests, copies of the response should be sent to both agencies.

Feel free to contact Ms. Jodi Feld at (312) 886-6192, or Mr. Ross Ohman of the MPCA at (612) 296-7280, if you have any questions regarding our review or need assistance.

Sincerely yours,

Daniel J. Benasick for

William H. Miner, Chief
Technical, Permits, and Compliance Section

cc: Honorable Leland Knutson
Mayor, Rosemount

Ronald Spong
Dakota County Community Health Service

Steven A. Reed
MPCA, Roseville

Ross Ohman
MPCA, Roseville

5HW-13:JFeld:PG:11/26/84

INITIALS	DATE	11/26/84	11/26/84	11/27/84	11-27-84 IS for CHIEF 11-28-84	WMB CHIEF	WMD DIRECTOR
		TPYST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	



SPERRY CORPORATION
COMPUTER SYSTEMS
SPERRY PARK, P.O. BOX 64525
ST. PAUL, MINNESOTA 55164-0525
TELEPHONE (612) 456-2222

October 8, 1984

RECEIVED
OCT 12 1984

WMD-RAIU
EPA, REGION V

Mr. William H. Miner, Chief
Technical, Permits and Compliance Section
United States Environmental Protection Agency
Region V
230 South Dearborn St.
Chicago, IL 60604

Re: Part B Permit Application, Sperry Corporation Sperry Park
Facility, MND000823914

Dear Mr. Miner:

Enclosed are revisions to our Part B permit application for our
Sperry Park facility which you requested in your letter dated
September 6, 1984.

- Item 1. The items inadvertently omitted from Part A application
are included. Pages 8, 9 & 12.
- Item 2. The inspection procedures are retained for a minimum
of three years in the environmental lab as stated
on page 100.
- Item 3. As noted on page 100, we reference ECP 37029, which
includes the equipment and processes that are inspected.
The procedure (ECP 37029) is included on pages 106-
115.

Note: Pages 106-142 in the original submitted should
be removed as this new procedure (ECP 37029)
incorporates all of the requirements in one
procedure.

- Item 4. The same comments noted in item 3 above apply.
- Item 5. The frequency of inspection is noted on in ECP 37029,
as shown on pages 106-115.
- Item 6. The arrangements made with local fire, police, and
emergency facilities is shown on page 153 A. The
copies of letters of transmittal was included in our
revisions submitted on 9/7/84 (Pages 238A-C). A
copy of all revisions submitted on that date are
included with these revisions.

- Item 7. A page 153A, the primary authorities are shown as
the City of Eagan Fire and Police Department.

RECEIVED

OCT 11 1984

WASTE MANAGEMENT
BRANCH

COPY 2

217-9

Mr. William H. Miner

October 8, 1984

Page 2

- Item 8. Information on the facility emergency equipment is noted on page 153, section G-1. Specific information is shown on pages 159 and 167 of the original submittal.
- Item 9. Information requested on the contingency plan is shown on page 153.
- Item 10. Procedures for separating incompatible waste is shown on page 154A.
- Item 11. Information requested on our training program is included on page 248, (personnel Training) and 248A (Section H-2).
- Item 12. The unclosed portion of the facility is addressed on page 412.
- Item 13. Equipment decontamination procedures are addressed on page 412 and 416.
- Item 14. Closure plan information requested is shown on page 412.
- Item 15. This facility is requesting a storage permit only. Therefore it is my understanding post closure requirements are not necessary.
- Item 16. Information on injection and withdrawal wells is included on page 21. A print of the well locations is shown on page 14.
- Item 17. Original signatures on the revised Part A and Part B is included.

As stated previously we have also included the revisions which we've submitted on 9/7/84. These revisions are noted as "Revision A, 9/7/84". The new revisions are noted as "Revision B, 9/27/84".

We are sending 2 copies of these revisions to you and two copies to Mr. Reed of the Minnesota Pollution Control Agency.

Sincerely,

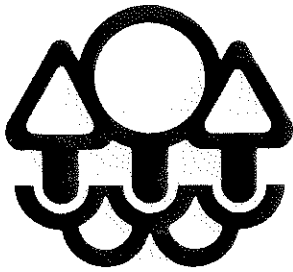
SPERRY



Roger J. Martin
Manager

Environmental Management

/lmk



Minnesota Pollution Control Agency

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

September 24, 1984

Mr. Roger Martin
Sperry-Shepard Road Facility
P. O. Box 3525, M.S. U1N14
St. Paul, Minnesota 55165

Dear Mr. Martin:

Re: Call-in of the Minnesota State Part B
Of the Hazardous Waste Permit Application
Sperry Park Facility, Eagan, Minnesota
MND000823914

The Minnesota Pollution Control Agency (MPCA) is currently reviewing Part B of your federal hazardous waste permit application cooperatively with Region V of the U.S. Environmental Protection Agency (EPA). Under the authority of 6 MCAR § 4.4204 B.1., this letter is a formal request for submittal of Part B of the State hazardous waste permit application.

As you may know, the Minnesota State Hazardous Waste Rules 6 MCAR §§ 4.9100-4.9560 became effective on July 16, 1984. Also in place are State rules which establish permitting procedures for hazardous waste facilities (6 MCAR §§ 4.4001-4.4021 and §§ 4.4201-4.4224). The State has made a formal application to EPA for authorization to administer a State hazardous waste program in lieu of the federal program. The MPCA is anticipating receiving such authorization early in 1985.

Upon receipt of authorization from EPA, the MPCA will assume EPA's role in the hazardous waste permit program. All hazardous waste permits issued by EPA will eventually be replaced with State hazardous waste permits. All hazardous waste permit applications under review by EPA will need to be replaced with corresponding State applications. Therefore, we are now requiring submittal of State Part B permit applications from those facilities which currently have federal applications under review.

Phone: 612/296-7301

1935 West County Road B2, Roseville, Minnesota 55113-2785

Regional Offices • Duluth/Brainerd/Detroit Lakes/Marshall/Rochester

Equal Opportunity Employer



Mr. Roger Martin
Page Two

While 6 MCAR § 4.4204 B.1. allows you six months from the date you receive this letter, I would suggest that you consider using the federal Part B as the basis for your State Part B. This will entail submitting a written request to use the federal Part B instead of preparing a new State Part B and submitting any additional information that is required by the State rules (including a revised Part A, if necessary).

In order to provide you with a timely review of your application, I would encourage you to send such a request as soon as possible. The written request, or a complete State Part B application, is due within six months of your receipt of this letter, and should be submitted in duplicate to:

Steven A. Reed
Minnesota Pollution Control Agency
Solid and Hazardous Waste Division
1935 West County Road B2
Roseville, Minnesota 55113-2785

Please note that you have already paid the permit application fee required by State Rules 6 MCAR §§ 4.9701-4.9706. Therefore, an application fee is not required to be submitted with the State Part B application.

Failure to submit a full and complete Part B permit application by the due date is grounds for termination of interim status under 6 MCAR § 4.4216.

If you have any questions or wish to discuss this letter, please contact Mr. Reed at 612/296-7278.

Sincerely,



Thomas J. Kalitowski
Executive Director

TJK:pak

cc: Kenneth Skahn, U.S. Environmental Protection Agency, Region V, Chicago



SPERRY CORPORATION
COMPUTER SYSTEMS
SPERRY PARK, P.O. BOX 43525
ST. PAUL, MINNESOTA 55164-0525
TELEPHONE (612) 456-2222

September 7, 1984

RECEIVED
SEP 11 1984

WMD-RAIU
EPA, REGION V

Mr. Ken Skahn
United States Environmental Protection Agency
Region 5
230 South Dearborn Street
Chicago, Illinois 60604

Re: Part B Permit Application, Sperry Corporation
Sperry Park Facility MND000823914

Dear Mr. Skahn:

Enclosed are revisions to our Permit B application for our Sperry Park facility. These revisions are a result of the comments noted in an inspection of this facility on August 2, 1984; a letter from Mr. Nancy Misra, of the MPCA staff, dated August 8, 1984; and comments in a telephone conversation with Mr. Ross Ohman of the MPCA staff.

Item 1. Page 1 of the original permit application is changed by removing reference to this facility as a transfer facility. This facility has not nor will not receive hazardous waste from any other facility.

Item 2. The Permit A application has been revised as follows:

Page 9 of the application - the unit of measurement was inadvertently omitted when the original Part B application was submitted. We also removed the reference to the volume of waste processed through our pretreatment facility because it is exempted from these regulations.

Page 11-The words "Included in above" were added on lines 5 and 8. Reference to the waste processed through the pretreatment system was removed.

Page 12-The notation identifying Sperry as the owner/operator of the facility in Section VIII, A was not shown when the original Part B application was submitted.

Item 3 The street address of the facility omitted the city in which the facility exists.
(Page 15 of the application.)

217-7

Page 16 is also included because the change on page 15 resulted in information moving to page 16 of the application.

- Item 4. Page 20 stated that the Minneapolis-St. Paul International was 2 miles Northwest of this facility. This is revised to 3.4 miles.
- Item 5. Page 21, Section B-3b is revised to clarify the facilities relative distance above the Minnesota River.
- Item 6. A new print that more clearly shows the traffic flow is included.
- Item 7. A statement showing that the metal hydroxide sludge has been tested and does not have any free liquids. (Pages 42 and 42A)
- Item 8. The quantity of scrap printed circuit boards was incorrect on the original submittal. (Page 44)
- Item 9. Cooling water testing was identified in the original submittal. This was an error and reference to it has been deleted. (Page 74)
- Item 10. A reference is added in paragraph D-1 (Page 75) that figure D-3A (Page 97A) is added. Also on page 75, paragraph 2, we noted that all waste drums are stored on fiberglass grating to keep them out of standing water.
- Item 11. Reference is made on page 76, section D1, to the addition of a new procedure explaining the proper disposition of manifest copies. The new procedure is included in appendix D-3, (pages 91A, B, C, and D).
- Item 12. The addition of pages 92A through 92G and 95A, B and C is to provide additional information on our pretreatment system.
- Item 13. Page 96 is included to more clearly show the drain lines from the waste storage areas to the secondary containment system.

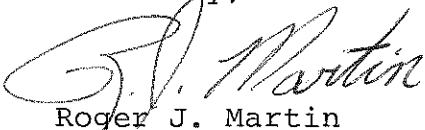
September 7, 1984
Page 3

- Item 14. Page 97 is included to clarify the location of aisle space for the waste container storage. Page 97A is added to show a storage area omitted in the original permit application.
- Item 15. On page 100, section F-2, of the application, we have made reference to a new procedure for inspection of the hazardous waste operations. This new procedure, ECP 37029 (pages 121 through 129). The procedure states that the inspection log is maintained within the facility and the inspection log identifies what must be inspected, the frequency of inspection, the name of the person making the inspection, the time and date of the inspection, and any remedial action necessary.
- Item 16. Pages 238A, B, and C are added as additional documentation that the appropriate outside agencies have a copy of our contingency plan.
- Item 17. Page 248 is included because of a typographical error in section H-2.
- Item 18. Pages 300A, B and C and 308A, B, and C are added as additional documentation of annual training for those responsible for handling the hazardous waste.
- Item 19. Pages 414 through 418C are included because the closure plan was amended to show the schedule of closure if that were to take place.
- Item 20. Pages 419 through 426A are copies of an updated financial assurance statement from the Chief Financial Officer of the Sperry Corporation/

The revised pages are numbered so they may be inserted in the original application. We have included three-ring binders to make it easier to insert these changes if you wish to use them.

We are sending two copies of these changes to you and two copies to Mr. Reed of the Minnesota Pollution Control Agency.

Sincerely,



Roger J. Martin
Manager
Environmental Management

/cb

Enc. (2)

~~AUG 6 1984~~

Mr. Roger Martin
Environmental Manager
Sperry Computer Systems
Sperry Park Facility
P.O. Box 64525 M.S. UIN14
St. Paul, Minnesota

SEP 6 1984

RE: Notice of Deficiency
Part B Permit Application
Sperry Computer Systems
Sperry Park Facility
Eagan, Minnesota
MND 000-823-914

Dear Mr. Martin:

Thank you for submittal of the Resource Conservation and Recovery Act (RCRA), Part B, permit application for your facility.

This letter is to notify you that we have completed an initial review of the permit application accompanying your July 2, 1984, letter. The purpose of the review is to check for completeness of your permit application against a list of required information. Your application is missing some items (see enclosed checklist and comment sheet) which requires that we declare the application incomplete. The due date for submittal of the additional information is 30 days from the date of this letter. We encourage submittal at the earliest possible convenience so that our review may proceed. Please submit the information in the format of individual "revised and numbered" pages so that we can readily insert them in the appropriate places in the application. Two copies of the missing items should be forwarded to each of the addresses below:

RCRA Activities - Part B Permit Application
U.S. Environmental Protection Agency
Region V
P.O. Box A3587
Chicago, Illinois 60690-3587

Steven A. Reed
Minnesota Pollution Control Agency
Solid and Hazardous Waste Division
1935 West County Road B-2
Roseville, Minnesota 55113

During the completeness review, we noted several areas where clarification or supplemental information will be required during the technical review. A separate technical review letter will be sent regarding these

(Spoke w/ R Olman at AUSA before this letter went out in order to confirm agreement that NOD should be sent - contrary to completeness letter # 2175)

217-8

Should you have any questions regarding our review or need assistance, please feel free to contact Ms. Jodi Feld of my staff, at (312) 886-6192, or Mr. Ross Ohman of the MPCA, at (612) 296-7280.

ORIGINAL SIGNED BY
HAK CHO FOR

Enclosure

Steven A. Reed
Hazardous Waste Permit and Review Unit
MPCA

5HW-13:JFeld:PG:8-24-84

INITIALS	TYPYST <i>MB</i> 8/30/84	AUTHOR <i>JF</i> 9/4/84	STU #1 CHIEF	<i>for</i> STU #2 CHIEF <i>Km</i> <i>Stecher</i> 9/4/84	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD CHIEF
DATE								

COMMENT SHEET
SPERRY COMPUTER SYSTEMS
MND 000-823-914

1) Please provide the following information which was omitted from your Part A application.

a) Identification of facility operator status as Federal, State, private, public or other entity (40 CFR 270.13(d)).

OK REVISION
9/27/84

b) Statement that facility is or is not on Indian lands (40 CFR 270.13(f)).

OK

c) Name, address and telephone number of facility owner (40 CFR 270.13(e)).

OK

2) Please provide a statement as to where, at the facility, the inspection schedule and records will be kept (40 CFR 264.15(b)(2) and (d)).

OK

3) Please identify the equipment and processes that will be inspected (40 CFR 264.15(b)(1)).

OK

4) Please identify the types of problems all equipment/processes will be checked for (40 CFR 264.15(b)(3)).

OK

5) What is the frequency of these inspections? (40 CFR 264.15(b)(4)).

OK

6) Please provide documentation/description of arrangements or attempts at making arrangements with police department(s) and any equipment suppliers (40 CFR 264.37).

OK

7) Please provide documentation of agreements designating primary emergency authority (40 CFR 264.37(a)(2)).

OK

8) Please provide the addresses of the facility emergency coordinators (40 CFR 264.52(d)).

9) Please provide information about the facility's emergency equipment including location, description and capabilities (40 CFR 264.52(e)).

OK

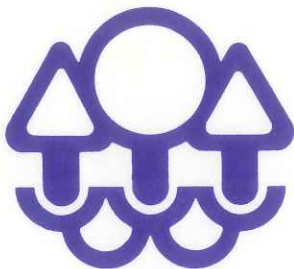
10) Please provide a statement indicating the location of the facility's copy of the contingency plan and the number of copies distributed and their location (40 CFR 264.53).

OK

11) Please provide a description of procedures to insure incompatible waste segregation during emergency cleanup (40 CFR 270.14(b)(7) and 40 CFR 264.56).

OK

- 12) Please provide information about your training program including a description of how training program meets actual job tasks, a description of procedures to ensure that all personnel receive this training and annual review, and a description of the training records kept and their location (40 CFR 270.14(b)(12), 40 CFR 264.16). *OK*
- 13) Please describe the maximum enclosed portion of the facility during the facility life (40 CFR 264.112). *OK*
- 14) Please describe equipment decontamination procedures at closure (40 CFR 264.114). *OK*
- 15) Please provide information about the facility's closure plan including the location and number of copies of the plan, the person responsible for updating the plan, and procedures for updating all other copies of the closure plan (40 CFR 264.112 and 40 CFR 264.113). *OK*
- 16) Please describe maintenance activities and frequencies during post-closure for final containment structures and facility monitoring equipment (40 CFR 264.117 and 40 CFR 264.118). *OK N/A*
- 17) Please provide information about any injection and withdrawal wells both on and off-site (40 CFR 270.14(b)(19)). *OK*
- 18) Please provide an original signature (by an authorized signatory) on the facility Part A application and on the Part B certification in accordance with 40 CFR 270.11. *OK*



Minnesota Pollution Control Agency

August 9, 1984

Mr. Kenneth Skahn, P.E.
Hazardous Waste Management Branch - 5HW-13
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

RECEIVED
AUG 13 1984
WASTE MANAGEMENT
BRANCH

Dear Mr. Skahn:

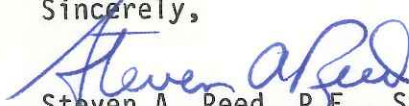
RE: Resource Conservation Recovery Act (RCRA)
Part B Application
Sperry Computer Systems, Sperry Park Facility
MND000823914 (Task 2, Output 1) G, TSD, PA

We have completed our preliminary review of the Sperry Park Facility, Eagan, Minnesota, Part B permit application.

This Part B application meets the requirements for completeness review in accordance with 40 CFR 124.3(c). However, as noted on the completeness review checklist enclosed, certain items will need further clarification during the technical review process.

If you have any questions on this review, please contact Mr. Ross Ohman of my staff at 612/296-7280.

Sincerely,


Steven A. Reed, P.E., Supervisor
Hazardous Waste Permit and Review Unit
Regulatory Compliance Section
Solid and Hazardous Waste Division

RECEIVED

AUG 14 1984

WMD-RAIU
EPA, REGION V

SAR/RL0:cj

Enclosure

cc: John Bartholow, Dakota County Community Health Services, Hastings
Richard Dell, U.S. Environmental Protection Agency, Chicago

Phone: 612/296-7278

1935 West County Road B2, Roseville, Minnesota 55113-2785

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217-5

JUL 11 1984

5HW-13

Steven A. Reed, Supervisor
Hazardous Waste Permits & Review Unit
Solid & Hazardous Waste Division
Minnesota Pollution Control Agency
1935 West County Road B-2
Roseville, Minnesota 55113

RE: RCRA Part B Permit Application
Sperry Univac Company
Eagan, Minnesota
MND 000-823-914

Dear Mr. Reed:

The above-referenced facility has advised us that two copies of the Part B application have been forwarded directly to your Agency. We request that you prepare (1) a completeness checklist, (2) written comments and (3) either a notice of deficiency letter or notice of completeness letter -- forwarding these items so that they are received in our office no later than August 10, 1984.

Please contact Ms. Jodi Feld, the U.S. Environmental Protection Agency permit writer for this facility, at (312) 886-6192, if you have any questions regarding the application.

Sincerely yours,

ORIGINAL SIGNED BY
WILLIAM E. MINER

William H. Miner, Chief
Technical, Permits, and Compliance Section

bcc: Ken Skahn, Minnesota SIO
Rich Dell, Minnesota SS

5HW-13:JFeld:PG:7-10-84

INITIALS	TYPIST <i>ph</i> 7-10-84	AUTHOR <i>Ken Skahn</i> 7/10/84	STU #1 CHIEF	STU #2 CHIEF <i>Ken Skahn</i> 7/10/84	STU #3 CHIEF	TPS CHIEF <i>WMB</i> 7/10/84	WMB CHIEF	WMD DIRECT
DATE								



SPERRY CORPORATION
COMPUTER SYSTEMS
SPERRY PARK, P.O. BOX 43525
ST. PAUL, MINNESOTA 55164-0525
TELEPHONE (612) 456-2222

July 2, 1984

RECEIVED
JUL 10 1984

WMD-RAIU
EPA, REGION V

Gregory Pederson
Division of Solid & Hazardous Waste
Minnesota Pollution Control Agency
1935 W. County Road B-2
Roseville, MN 55113

Enclosed is two copies of our Part B permit application
for Sperry Computer Systems D.S.D., Sperry Park facility
(MND000823914) for a hazardous waste storage facility.

The application fee of \$750 is included with the copies
submitted to the Minnesota Pollution Control Agency.

Sincerely,

SPERRY

R. J. Martin
Manager
Environmental Management

/lmk

cc: RCRA ACTIVITIES
Part B Permit Application

DEC 06 1983

5HW-13

Mr. Roger J. Martin
Environmental Manager
Sperry Univac DSD
Box 3525, Mail Station UIN14
St. Paul, Minnesota 55165

RE: Sperry Univac DSD
MND 000-823-914
St. Paul, MN

Dear Mr. Martin:

By now you should have received our letter requesting submittal of the
Hazardous Permit Application, Part B, for the above-referenced facility.

A guidance document has been prepared for the use of hazardous waste
management facilities in the preparation of their permit applications.
A copy of that document is enclosed for your use.

Please contact me at (312) 886-3790, if you have any questions.

Sincerely yours,

Kenneth Skahn
Minnesota State Implementation Officer

Enclosure

cc: Gregory Pederson, MPCA

bcc: Ken Skahn, MN SIO
Part A File

5HW-13:KSkahn:PGRace:12-5-83

K. Skahn
12/6/83

NOV 30 1983

R. Skam

5HW-13

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Roger J. Martin
Sperry Univac DSD
Box 3525, Mail Station UINI4
St. Paul, MN 55165

RE: Sperry Univac DSD
St. Paul, MN
#MND 000-823-914

Dear Mr. Martin:

By now you should have received an acknowledgment of our receipt of the Part A permit application material for the above-referenced hazardous waste facility under the Resource Conservation and Recovery Act (RCRA) permit program. You should also have been apprised of your condition relative to interim status.

Accordingly, this letter constitutes the next step in the formal process leading toward issuance or denial of an RCRA permit. Under the authority of 40 CFR 270.10, this is a formal request for submittal of Part B of the permit application for the above-referenced facility.

Enclosed is a copy of 40 CFR 270.14-270.19 which lists the items required in the Part B permit application for the facility. The Part B application must be submitted in quadruplicate and postmarked no later than July 2, 1984. Please uniquely number each page of the application including all attachments (maps, specifications, etc.). A certification statement identical to one stated in 40 CFR 270.11 must accompany the application and all additional submittals.

Send two copies to:

RCRA ACTIVITIES
Part B Permit Application
U.S. EPA, Region V
P.O. Box A3587
Chicago, Illinois 60609-3587

Send two copies to:

Gregory Pederson
Division of Solid & Hazardous Waste
Minnesota Pollution Control Agency
1935 W. County Road B-2
Roseville, Minnesota 55113

We will coordinate review of the application with the Minnesota Pollution Control Agency. We are committed to conducting the RCRA permit process as efficiently as possible. Consequently, I suggest you contact Jodi ~~FELds~~ of my staff, at (312) 353-2197, as you begin preparing your application. Ms. ~~FELds~~ will be available to discuss specific needs of your application or to meet with you in Chicago.

Failure to furnish the complete Part B permit application by the above date, and to provide in full all required information, is grounds for termination of interim status under 40 CFR 270.10.

Information you submit in the Part B permit application can be disclosed to the public, according to the Freedom of Information Act and U.S. Environmental Protection Agency (U.S. EPA) Freedom of Information regulations. If you wish, however, you may assert a claim of business confidentiality by printing the word "Confidential" on each page of the application which you believe contains confidential business information. U.S. EPA will review business confidentiality claims under regulations at 40 CFR Part 2, and will later request substantiation of any claims. Please review these rules carefully before making a claim.

If you claim parts of the application as confidential, please provide us and the State with a public information copy of the application. The public information copy must be identical to the full application with the exclusion of the confidential information.

We have also enclosed a copy of 40 CFR Part 264 which includes technical standards for the operation of treatment, storage and disposal facilities. These standards would become applicable upon issuance of an RCRA permit to the facility by U.S. EPA. Also enclosed for your use is a copy of our "Guidance For Permit Application Preparation" which should help you avoid the typical deficiencies found in previous application submittals.

We look forward to receiving your Part B permit application.

Sincerely yours,

ORIGINAL SIGNED BY
WILLIAM H. MINER for

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosures: 40 CFR 270.14-270.19
40 CFR 264
Guidance for Permit Application Preparation

cc: Gregory Pederson, MPCA

bcc: Ken Skahn, Permit Contact
Dan Banaszek
Jodi Fields

Same letter sent to:

1. Robert Baglo
G.M. Stewart Lumber Co
2. Annettee Ehritt
U.O.P. Inc.
3. Jon David Pakarinen
Honeywell, Inc.

4. William Pepper
Continental Can Co.
5. Eric Radke
Henkel Tech. Ctr.
6. Roger Martin
Sperry Univac DSD
7. Mark Johnson
Timber Wholesale

5HW-13:KSkahn:JTurner:11-21-83

	JYLIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	Bone 1129 CHIEF	Acty CHIEF	AND DIRECTOR
INITIALS	<i>[Signature]</i>	<i>Ken Steahn</i>		DJB		<i>Worm</i>	<i>Worm</i>	
DATE	11/25/83	11/28/83		11/28/83		11/30/83	11/30/83	

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Roger J. Martin
Manager, Environmental Management
Sperry Corporation
Defense Production Group
Sperry Park, P.O. Box 64525
St. Paul, Minnesota 55169-0525

RE: Hazardous Waste Facility
Permit for Sperry,
Defense Systems Division
Eagan, Minnesota
HMD 000-823-914

Dear Mr. Martin:

The purpose of this letter is to inform you that pursuant to the Solid and Hazardous Waste Amendments of 1984 (HSWA), permit provisions concerning waste minimization and corrective action for past or continuing release, are necessary. Since the Minnesota Pollution Control Agency (MPCA) is not yet authorized to implement the provisions of HSWA, the U.S. Environmental Protection Agency (U.S. EPA) retains the authority to implement these provisions.

On July 10, 1985, Sperry Corporation certified to the U.S. EPA and MPCA that no solid waste management units, other than those that were the subject of the draft hazardous waste permit public noticed by MPCA on August 1, 1985, exist at the facility. The public notice solicited information from the public regarding any solid waste management units or releases of hazardous waste or constituents from such units at this facility. No comments were received from the public concerning this matter.

Therefore, this letter should be considered a permit decision that, based on the Permittee's certification dated July 10, 1985, no corrective action for past or continuing releases of hazardous wastes or constituents is required.

However, the Permittee must inform the U.S. EPA of any deviations from, or changes in, the information concerning solid waste management units and/or releases which would affect the Permittee's ability to comply with applicable federal regulations.

In addition, pursuant to 40 CFR 264.73(b)(9), the Permittee's operating record shall contain a certification by the Permittee no less often than annually, that the Permittee has a program in place to reduce the volume and toxicity of hazardous waste that he generates to the degree determined by the Permittee to be economically practicable; and the proposed method of treatment, storage or disposal is that practicable method currently available to the Permittee which minimizes the present and future threat to human health and the environment.

This permit decision is effective this date and shall remain in effect until October 1, 1990, unless revoked and reissued, or terminated.

Since MPCA issued a hazardous waste permit to your organization for this facility on October 2, 1985, this permit decision, together with the MPCA permit, constitutes a Resource Conservation and Recovery Act permit and terminates interim status for this facility.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

cc: Mr. Steven A. Reed
Minnesota Pollution Control Agency

Mr. Thomas J. Kalitowski
Executive Director
Minnesota Pollution Control Agency

ORC aa 10/9/85

mk 10/8/85
Cup 10/18/85
m6 10/13

	TYP.	AUTH.	IN CHARGE	IN CHARGE	IN CHARGE	IN CHARGE	IN CHARGE	IN CHARGE	IN CHARGE	IN CHARGE
INT. DATE	10/8/85	10/8				10/8		10/8/85	10/18/85	10/16/85

10/16/85
10/16/85
10/16/85

7

Mr. Roger Martin
Environmental Manager
Sperry Computer Systems
Sperry Park Facility
P.O. Box 64525 M.S. UIN14
St. Paul, Minnesota 55164

Dear Mr. Martin:

RE: Notice of Completeness
Sperry Computer Systems, Sperry Park Facility
Eagan, Minnesota
MND000823914

Thank you for the submittal of your Part B Resource Conservation and Recovery Act (RCRA) permit application. This letter is to notify you that, pursuant to 40 CFR 124.3 we have completed an initial review of your Part B application for a RCRA permit to store hazardous waste. The purpose of this review is to check for completeness of your permit application against a list of required information delineated under 40 CFR 270.14 through 270.29 (previously 40 CFR 122.25), on pages 14235-14241, Federal Register 48, April, 1, 1983. As a result of this review, your application is considered complete enough to begin a technical evaluation.

During the review for technical adequacy, we will analyze the technical aspects of the application in-depth, in order to make a tentative decision to either prepare a draft permit or deny the application. We will be working cooperatively with the Minnesota Pollution Control Agency (MPCA) throughout the course of this review. Please understand that either, or both, of our agencies may request additional information from you if it is necessary to clarify, modify, or supplement previously submitted material. A timely response on your part to any such requests should allow us to advise you of our tentative decision in a timely fashion.

Page Two

Please feel free to contact Ms. Jodi Feld at 312/886-6192 or Mr. Ross Ohman of the MPCA at 612/296-7280, if you should have any questions regarding our review or need assistance.

Sincerely,

William H. Miner, Chief
Technical, Permits, and Compliance Section
Waste Management Branch

WHM/RL0:cj

cc: Mr. Steven A. Reed, Supervisor, Hazardous Waste Permit and Review Unit, MPCA

JUL 11 1984

5HW-13

Steven A. Reed, Supervisor
Hazardous Waste Permits & Review Unit
Solid & Hazardous Waste Division
Minnesota Pollution Control Agency
1935 West County Road 6-2
Roseville, Minnesota 55112

RE: RCRA Part 9 Permit Application
Sperry Univac Company
Eagan, Minnesota
MND 000-023-914

Dear Mr. Reed:

The above-referenced facility has advised us that two copies of the Part 9 application have been forwarded directly to your Agency. We request that you prepare (1) a completeness checklist, (2) written comments and (3) either a notice of deficiency letter or notice of completeness letter -- forwarding these items so that they are received in our office no later than August 10, 1984.

Please contact Ms. Jodi Feld, the U.S. Environmental Protection Agency permit writer for this facility, at (912) 706-6192, if you have any questions regarding the application.

Sincerely yours,

ORIGINAL SIGNED BY
WILLIAM E. MUND
William E. Mund, Chief
Technical, Permits, and Compliance Section

bcc: Ken Skahn, Minnesota S10
Rich Dell, Minnesota SS

5HW-13:JFeld:PG:7-10-84

217-4

B.1.8

STATE OF MINNESOTA
POLLUTION CONTROL AGENCY

HAZARDOUS WASTE FACILITY PERMIT

SPERRY
SPERRY PARK FACILITY
3333 PILOT KNOB ROAD
EAGAN, MINNESOTA 55121
MND 000 823 914

In accordance with the provisions of Minnesota Statutes Chapters 115 and 116, Minn. Rules Parts 7001.0010 - 7001.0730 and Minn. Rules Parts 7045.0100 - 7045.1030, Sperry, Sperry Park Facility, 3333 Pilot Knob Road, Eagan, Minnesota (hereafter "Permittee"), is authorized by the Minnesota Pollution Control Agency (MPCA), to operate hazardous waste storage rooms and the secondary containment tanks located in the northwest section of the Sperry, Sperry Park building as indicated in figures D-2 and D-3, pages 96 and 97 of the waste analysis plan Attachment I located in Section 9, T27N, R23W, in the municipality of Eagan, Dakota County, Minnesota under the limitations and conditions set forth herein.

This permit shall become effective on the date of issuance by the MPCA Director (hereafter the "Director").

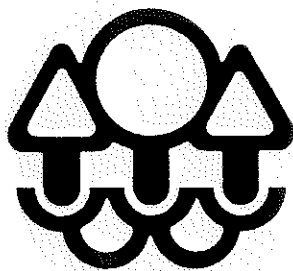
This permit is effective until 5 years from the date of issuance or until terminated, revoked, or amended by the MPCA. To obtain a reissued permit, the Permittee shall request that the MPCA review and reissue the permit. In accordance with Minn. Rules Part 7001.0040, subp. 3, an application for reissuance of the permit must be submitted no later than 180 calendar days prior to the expiration date of this permit.

DATE OF ISSUANCE:

October 2, 1985

Dale Wikre

DALE L. WIKRE, DIRECTOR
SOLID AND HAZARDOUS WASTE DIVISION



Minnesota Pollution Control Agency

October 2, 1985

RECEIVED

OCT 4 1985

SWB - AIS
U.S. EPA, REGION V

Mr. Roger J. Martin
Environmental Manager
Sperry, Sperry Park Facility
P.O. Box 64525, M.S. UIN14
St. Paul, Minnesota 55164

Dear Mr. Martin:

RE: Hazardous Waste Permit Issuance
Sperry, Sperry Park Facility
MND000823914

Enclosed is a copy of the Minnesota Pollution Control Agency (MPCA) Hazardous Waste Storage Permit for your Sperry Park facility which is located in the City of Eagan, Dakota County, Minnesota.

This permit has been prepared pursuant to Minnesota Statutes Chapters 115 and 116 and Minn. Rules pts. 7000.1700, 7001.0010-.0730, and 7045.0100-.1260. The permit is effective on the date of issuance for a period of five years or until terminated, revoked, or amended by the MPCA.

Should you have any questions regarding this permit, please contact Mr. Steven A. Reed of my staff at 612/296-7786.

Sincerely,

Dale L. Wikre
Director
Solid and Hazardous Waste Division

DLW:cj

Enclosures

cc: Ron Spong, Dakota County Community Health Services, Hastings
Charles Slaustus, U.S. Environmental Protection Agency, Chicago
Joel Morbito, U.S. Environmental Protection Agency, Chicago
Phone 612/296-7282

COPY 2

1935 West County Road B2, Roseville, Minnesota 55113-2785

Regional Offices: Duluth/Brainerd/Detroit Lakes/Marshall/Rochester

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The Permittee is allowed to store hazardous waste in accordance with the conditions of this permit. Any hazardous waste management activities conducted by the Permittee at the facility for which this permit is issued which are not authorized by this permit must be conducted in accordance with Minn. Rules Parts 7001.0010 - 7001.0730 and Minn. Rules Parts 7045.0100 - 7045.1030 (Supp. 1984). Compliance with this permit with respect to the activities covered by this permit constitutes compliance, for purposes of enforcement, with the hazardous waste permitting requirements of Minn. Rules Part 7001.0720 and Minn. Rules Parts 7045.0100 - 7045.1030 (Supp. 1984).

PART I

DESCRIPTION OF FACILITY

The Sperry Corporation, Defense Systems Division (DSD), Sperry Park Facility is located in Eagan, Minnesota. The Sperry Park Facility is the main engineering facility for this division. It produces U.S. Defense Department specified computer systems. Hazardous wastes are generated in the production of semiconductors and from multiple process labs used for research and development. The main operations that generate hazardous waste are: copper etching, copper and solder plating, and chemical cleaning. There is also a pretreatment system on site for neutralization and removal of heavy metals from the rinse waters prior to discharge into the metropolitan sanitary sewer system producing a heavy metal sludge. The hazardous wastes which are produced by Sperry are stored in the hazardous waste storage rooms equipped with secondary containment tanks located in the northwest section of the Sperry, DSD, Sperry Park building as indicated in figures D-2 and D-3, pages 96 and 97 of the waste analysis plan Attachment I, prior to shipment off-site for disposal.

PART II

EFFECT OF ISSUANCE

A. Issuance of this Permit by the MPCA does not release the Permittee from any liability, penalty, or duty imposed by Minnesota or federal statutes, rules or local ordinances, except the obligation to obtain this permit.

B. Issuance of this permit by the MPCA does not release the Permittee from any third-party liability which the Permittee may incur as a result of the operation of the permitted facility.

C. This permit does not prevent the future adoption by the MPCA of pollution control rules, standards, or orders more stringent than those now in existence and does not prevent the enforcement of these rules, standards, or orders against the Permittee.

D. This permit does not convey a property right or an exclusive privilege.

E. This permit does not obligate the Director to enforce local laws, rules, or plans beyond that authorized by Minnesota statutes.

F. This permit authorizes the Permittee to perform the activities described in this permit under the conditions of this permit. In issuing this permit, the State and Director assume no responsibility for injury to persons or damages to property or the environment caused by the activities of the Permittee in the conduct of its actions, including those activities authorized, directed, or undertaken under this permit. To the extent the State and Director may be liable for the activities of its employees, that liability is explicitly limited to that provided in the Tort Claims Act, Minnesota Statutes, Section 3.736.

G. Compliance with the terms of this permit does not constitute a defense to any action brought under Section 7003 of RCRA, Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9601 et seq., commonly known as CERCLA), The Minnesota Environmental Response and Liability Act of 1983 (Minnesota Statutes chapter 115B), and Minnesota Statutes chapters 116, 400, 473, or any other Minnesota or federal statutes, regulations, or local ordinances relating to any release of hazardous substances from the permitted facility.

H. This permit establishes minimum standards for the operation of the permitted facility. Nothing in this permit precludes the Permittee from taking additional steps to protect the public health or welfare or the environment so long as these additional steps are not inconsistent with the terms and conditions of this permit. The Permittee is solely responsible for ensuring that the permitted facility adequately safeguards public health and welfare and the environment.

PART III

RECORD KEEPING REQUIREMENTS

A. DOCUMENTS TO BE MAINTAINED AT FACILITY SITE

The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions and modifications to these documents:

1. A waste analysis plan prepared in accordance with Minn. Rules Part 7045.0458. The Permittee's waste analysis plan, set forth in Attachment I to this permit, is incorporated herein by reference and made an integral and enforceable part of this permit.

2. Personnel training documents and records prepared in accordance with Minn. Rules Part 7045.0454. The Permittee's personnel training documents are set forth in Attachment II to this permit, and are incorporated herein by reference and made an integral and enforceable part of this permit.

3. A contingency plan prepared in accordance with Minn. Rules Part 7045.0466. The Permittee's contingency plan, set forth in Attachment III to this permit, is incorporated herein by reference and made an integral and enforceable part of this permit.

4. A closure plan prepared in accordance with Minn. Rules Part 7045.0486. The Permittee's closure plan, set forth in Attachment IV to this permit, is incorporated herein by reference and made an integral and enforceable part of this permit.

5. A cost estimate for closure prepared in accordance with Minn. Rules Part 7045.0502. The Permittee's cost estimate for closure is set forth in Attachment IV to this permit, is incorporated herein by reference and made an integral and enforceable part of this permit.

6. An operating record required by Minn. Rules Part 7045.0478 and Part IV.B of this permit.

7. Inspection schedules developed in accordance with Minn. Rules Part 7045.0452, subp. 5. The Permittee's inspection schedules are set forth in Attachment V to this permit, and is incorporated herein by reference and made an integral and enforceable part of this permit.

B. OPERATING RECORD

The Permittee shall keep a written operating record at the facility site that contains the following information:

1. The names of the generators of the hazardous waste and their identification numbers.

2. The date of arrival of each shipment along with the transporter's name and identification numbers.

3. A description and the quantity of each hazardous waste received, and the method and date of treatment, storage, or disposal at the facility.

4. The location of each hazardous waste within the facility and the quantity at each location. This information must include cross-references to specific manifest document numbers if the waste was accompanied by a manifest.

5. Records and results of waste analysis performed as specified in Minn. Rules Parts 7045.0456, 7045.0458, and 7045.0542, subp. 2.

6. Summary reports and details of all incidents that require implementing the contingency plan as specified in Minn. Rules Part 7045.0470.

7. Records and results of inspections as required by Minn. Rules Part 7045.0452, subp. 5.

8. Monitoring, testing, or analytical data where required by Minn. Rules Parts 7045.0484; 7045.0532, subp. 5; 7045.0534, subps. 5 and 6; 7045.0536, subps. 5, 6, and 8; 7045.0538, subps. 5 and 6; and 7045.0542, subp. 7.

9. For off-site facilities, notices to generators as specified in Minn. Rules Part 045.0452, subp. 3, item C.

10. All closure cost estimates under Minn. Rules Part 7045.0502 and, for disposal facilities, all post-closure cost estimates under Minn. Rules Part 7045.0506.

C. PERSONNEL RECORDS

The Permittee shall retain the following personnel records at the facility:

1. The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;

2. A written job description of each position at the facility related to hazardous waste. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications and duties of employees assigned to each position;

3. A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position described in item A; and

4. Records that document that the training or job experience required in accordance with Minn. Rules Part 7045.0454 has been given to, and completed by, facility personnel.

D. MONITORING AND TESTING RECORDS

1. The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least three years from the date of the sample, measurement, report or record. These periods may be extended by request of the Director at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.

2. Records of monitoring information shall specify:

a. The date(s), exact place, and time(s) of sampling or measurements;

b. The individual(s) who performed the sampling or measurements;

c. The date(s) analyses were performed;

d. The individual(s) who performed the analyses;

e. The analytical techniques or methods used; and

f. The results of such analyses.

E. RETENTION AND DISPOSITION OF RECORDS

The retention period for all records required under Minn. Rules Parts 7045.0450 to 7045.0544 is three years and is extended automatically during the course of an unresolved enforcement action regarding the facility.

F. INSPECTION RECORDS

The Permittee shall record these inspections in an inspection log. These records must include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions.

PART IV

REPORTING REQUIREMENTS

A. TWENTY-FOUR HOUR REPORTING

If the Permittee discovers a release or discharge of hazardous waste which could be a danger to public drinking water supplies or threaten human health or the environment or discovers a fire or explosion at a hazardous waste facility which could threaten human health or the environment outside the facility, the permittee shall, as soon as possible, but in no case later than 24 hours after the discovery of the incident, orally notify the Director of the incident and its description. Within 15 days after the incident the Permittee shall submit a written report describing the incident. The oral and written descriptions of the incident shall include at a minimum:

1. The name, address, and telephone number of the owner or operator;
2. The name, address, and telephone number of the facility;
3. The date, time, and type of incident;
4. The name and quantity of materials involved;
5. The extent of damages or injuries, if any;
6. An assessment of actual or potential hazards to the environment and human health outside the facility; and
7. The estimated quantity and disposition of recovered hazardous materials.

B. REPORTING NONCOMPLIANCE

The Permittee shall report noncompliance with this permit not reported under A above as a part of the next report which the Permittee is required to submit under this permit. If no reports are required within 30 days of the discovery of the noncompliance, the Permittee shall submit the information required in A above regarding the noncompliance within 30 days of the discovery of the noncompliance.

C. REPORTING PLANNED CHANGES

The Permittee shall give advance notice to the Director as soon as possible of any planned physical alterations or additions

to the permitted facility or activity that may result in noncompliance with a Minnesota or federal pollution control statute or rule or a condition of this permit.

D. ADDITIONAL REPORTING

In addition to the reports required elsewhere by this permit, the Permittee shall submit the following reports:

1. If the Permittee discovers a significant discrepancy in a manifest, the Permittee shall attempt to reconcile the discrepancy. If the Permittee is unable to reconcile the discrepancy within ten days, the Permittee shall submit to the Director a written report and a copy of the manifest in accordance with Minn. Rules Part 7045.0476, subp. 3, item A.

2. If a shipment of hazardous waste is delivered to the Permittee without the required manifest or shipping paper, the Permittee shall attempt to reconcile the discrepancy. If the Permittee is unable to reconcile the discrepancy, the Permittee shall, prior to the acceptance of the waste, notify the Director of the delivery of the waste and shall submit to the Director a follow-up report within ten days of receipt of the waste in accordance with Minn. Rules Part 7045.0482, subp. 3. The Director will inform the Permittee of the appropriate disposition of the waste.

3. In accordance with Minn Rules Part 7045.0482, subp. 2, the Permittee shall submit an annual report concerning the activities at the facility conducted pursuant to this permit during the previous calendar year.

4. If the Permittee receives hazardous waste which the Permittee is not authorized by this permit to manage, the Permittee shall immediately notify the Director of the receipt of the waste in accordance with Minn. Rules Part 7045.0476, subp. 3, item C. The Director will inform the Permittee of the appropriate disposition of the waste.

G. SIGNATORY REQUIREMENTS

All reports or other information required to be submitted to the MPCA in accordance with the requirements of this permit shall be signed by an officer of the corporation. The officer's signature shall be certification by the officer that he or she has read the document and that to the best of his or her knowledge, information, and belief, the information in the document is true. A person who is not an officer may sign the document if:

1. the authorization is made in writing by persons identified in the permit application except that for a corporation the written authorization must be made by a principal executive officer of at least the level of vice-president;

2. the authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, superintendent, or a person of equivalent responsibility; and

3. the written authorization is submitted to the director.

If authorization is no longer accurate, a new authorization must be submitted to the Director prior to or together with any reports or permit applications to be signed by an authorized representative.

F. SUBMITTAL OF WRITTEN REPORTS

All written reports required to be submitted by this permit shall be sent to:

Chief, Regulatory Compliance Section
Solid and Hazardous Waste Division
Minnesota Pollution Control Agency
1935 West County Road B-2
Roseville, Minnesota 55113-2785

PART V

OPERATIONAL CONDITIONS

A. CERTIFICATION OF CONSTRUCTION OR MODIFICATION

The Permittee shall not commence treatment, storage, or disposal of hazardous waste in a newly constructed or modified portion of the facility until:

1. the Permittee has submitted to the Director by certified mail or hand delivery a letter signed by the Permittee and by a registered professional engineer stating that the facility has been constructed or modified in compliance with the conditions of this permit; and

2. the Director has inspected the facility and has provided the Permittee with a letter stating that, based on information available to the Director, the facility appears to have been constructed in compliance with the conditions of this permit.

B. PROPER OPERATION AND MAINTENANCE

1. The Permittee shall at all times properly operate and maintain the facilities and systems of treatment and control and the appurtenances related to them which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. The Permittee shall install and maintain appropriate back-up or auxiliary facilities if they are necessary to achieve compliance with the conditions of this permit.

2. The Permittee shall establish, construct, operate, maintain and close the facility in accordance with:

a. The plans, specifications, and reports identified in this permit;

b. The Minnesota Hazardous Waste Rules Chapters 7001 and 7045;

c. The conditions of this permit and the attachments.

3. The Permittee shall prevent the discharge of hazardous waste from the facility to the surface waters or ground waters of the state. The Permittee shall prevent hazardous waste from entering drains, sewer inlets, storm sewers, sanitary sewers, doorways, vents, tunnels, pipes, windows or areas with permeable earth or soil floors.

4. The Permittee shall operate and maintain the facility to minimize the possibility of fire, explosion, or any sudden or nonsudden release to air, land, or water of hazardous waste constituents.

5. The Permittee shall not engage in activities that would result in emissions of air contaminants causing violations of the ambient air quality standards set forth in Minnesota Rules Parts 7005.0010 - 7005.0080.

6. The Permittee shall maintain lighting at the facility in a manner sufficient to ensure safety and proper operation if the facility is operated in hours of darkness.

C. REQUIRED NOTICES

1. If the Permittee has arranged to receive hazardous waste from a foreign source, the Permittee shall notify the Director as well as the Environmental Protection Agency's (EPA) Region V Administrator in writing at least four weeks in advance of the date the waste is expected to arrive at the facility. Notice of subsequent shipments of the same waste from the same foreign source is not required in the same calendar year.

2. The Permittee may not accept a shipment of hazardous waste which the Permittee is not allowed to manage in accordance with this permit. The Permittee shall notify the Director immediately upon receiving any hazardous wastes which the Permittee is not allowed to accept under this permit. The Director will inform the Permittee of the appropriate disposition of the waste.

3. When the Permittee is to receive hazardous waste from an off-site source (except where the Permittee is also the generator), the Permittee must inform the generator in writing that the Permittee has the appropriate permit(s) for, and will accept, the waste the generator is shipping. The Permittee shall keep a copy of this written notice as part of the operating record.

4. Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, the Permittee must notify the new owner or operator in writing of the requirements of Minn. Rules Chapter 7045 and all permitting requirements of Minn. Rules Chapter 7001. Failure of the Permittee to notify the new owner or operator of these requirements does not relieve the new owner or operator of the obligation to comply with all applicable requirements.

D. PERSONNEL TRAINING

The Permittee shall conduct personnel training in accordance with Minn. Rules Part 7045.0454. The personnel training program shall be conducted in accordance with Attachment II.

E. GENERAL WASTE ANALYSIS

The Permittee shall follow the procedures described in the waste analysis plan set forth in Attachment I.

The Permittee shall verify its waste analysis as part of the facility's quality assurance program. The quality assurance program shall be in accordance with current EPA practices (Test

Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846, July, 1982) or equivalent methods approved by the Director. At a minimum, the quality assurance program shall ensure that the Permittee maintains proper functional instruments, uses approved sampling and analytical methods, assures the validity of sampling and analytical procedures and performs correct calculations.

F. MANIFEST SYSTEM

The Permittee shall comply with the manifest requirements of Minn. Rules Part 7045.0474.

G. REQUIREMENTS FOR MONITORING AND TESTING

Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method set forth in Appendix I of Title 40 of the Code of Federal Regulations Part 261, dated August 28, 1981. Laboratory methods must be those specified in Test Methods for Evaluating solid Waste: Physical/Chemical Methods SW-846, July, 1982, or an equivalent method as specified in the attached Waste Analysis Plan.

H. CONTAINMENT

1. The Permittee shall maintain the container storage area containment system to ensure that the system is capable of collecting and holding spills, leaks, and precipitation. The maintenance of the containment system must ensure that:

a. The base underlying the containers is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed;

b. The base is sloped, or operated to drain and remove liquids resulting from leaks, spills, and accumulated precipitation, unless the containers are protected from contact with accumulated liquids;

c. Has sufficient capacity to contain ten percent of the volume of containers or the volume of the largest container, whichever is greater. Containers that do not contain free liquids need not be considered in this determination.

2. Run-on into the containment system is prevented.

3. The Permittee shall remove any spilled or leaked waste or accumulated precipitation from the sump or collection area in as timely a manner as is necessary to prevent overflow of the collection system. If the collected material is a hazardous waste as defined in Minn. Rules Parts 7045.0100 through 7045.0141, it must be managed as a hazardous waste in accordance with all applicable requirements of Minn. Rules Parts 7045.0205 through 7045.1030. If the collected material is discharged through a point source to waters of the United States, it is subject to the requirements of the Federal Water Pollution Control Act Amendments of 1972, United States Code, Title 33, Section 1342, as amended through June 30, 1983.

I. SPECIAL CONDITIONS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE

1. General requirements

a. Required notices. The Permittee shall take precautions to prevent accidental ignition or reaction of ignitable or reactive waste. This waste must be separated and protected from sources of ignition or reaction, including, but not limited to open flames, smoking, cutting and welding, hot surfaces, frictional heat, static sparks, electrical sparks, mechanical sparks, spontaneous ignition, and radiant heat. While ignitable or reactive waste is being handled, the Permittee shall confine smoking and open flame to specially designated locations. "No Smoking" signs must be conspicuously placed wherever there is a hazard from ignitable or reactive waste.

b. Required precautions. When specifically required by other rules in this chapter, the Permittee of a facility that treats, stores, or disposes of ignitable or reactive waste or mixes incompatible waste or incompatible wastes and other materials, shall take precautions to prevent reactions which:

i. generate extreme heat, pressure, fire, explosions, or violent reactions unless the process has a permit to handle these types of reactions;

ii. produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment;

iii. produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions;

iv. damage the structural integrity of the device or facility; or

v. through other like means threaten human health or the environment.

c. Documentation of compliance. When required to comply with subpart a or b, the Permittee shall document that compliance. This documentation may be based on reference to published scientific or engineering literature, data from trial tests, waste analyses, or the results of the treatment of similar wastes by similar treatment processes and under similar operation conditions.

2. Storage in containers - special requirements for ignitable or reactive waste. Containers holding ignitable or reactive wastes and materials must be located at least 15 meters (50 feet) from the facility's property line.

3. Storage in containers - special requirements for incompatible waste.

a. Two or more incompatible wastes or wastes which are incompatible with other material must not be placed in the same container, unless compliance with Minn. Rules Part 7045.0456, subpart 2 is achieved.

b. Hazardous waste must not be place in an unwashed container that previously held an incompatible waste or material. As required by Minn. Rules Part 7045.0458, the waste analysis plan must include analyses needed to comply with these special requirements. Minn. Rules Part 7045.0456, subp. 3 also requires waste analyses, trial tests, or other documentation to ensure compliance with Minn. Rules Part 7045.0456, subp. 2. As required by Minn. Rules Part 7045.0478, the Permittee shall place the results of each waste analysis, trial test, and any other documented information in the operating record of the facility.

c. A storage container holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks or surface impoundments, must be separated from the other materials or protected from them by means of a dike, berm, wall, or other device.

J. INSPECTIONS

1. General requirements. The Permittee shall follow the inspection schedule set forth in Attachment V.

2. Inspection of containers. At least weekly, the Permittee shall inspect areas where containers are stored, looking for leaking containers and for deterioration of containers and the containment system caused by corrosion or other factors. The Permittee shall comply with Parts VI.H.(3), VII.C.(1), and VII.E. and Minn. Rules Part 7045.0452, subp. 5, item D, if remedial action is required because deterioration or leaks are detected.

3. Inspection of secondary containment tanks.

a. In the event that spill or leak has occurred, the Permittee shall take necessary action pursuant to the contingency plan set forth in Attachment III.

K. STORAGE IN CONTAINERS

1. Waste identification. The Permittee is authorized to store the hazardous wastes or categories of hazardous waste in containers listed below in accordance with the requirements and conditions of this permit in the areas identified in the Permittee's waste analysis plan, Attachment I. The Permittee shall not store quantities of hazardous waste in any one room which exceed the secondary containment capabilities or the minimum aisle space requirements for that room.

EPA
HAZARDOUS
WASTE #

HAZARDOUS WASTE DESCRIPTION

D001	Waste exhibiting the characteristic of ignitability per Minn. Rules Part 7045.0131, subp. 2 (1984).
D002	Waste exhibiting the characteristic of corrosivity per Minn. Rules Part 7045.0131, subp. 4 (1984).
D003	Waste exhibiting the characteristic of reactivity per Minn. Rules Part 7045.0131, subp. 5 (1984).
D007, D008	Wastes exhibiting the characteristic of Extraction Procedure (EP) Toxicity for chromium and lead respectfully per Minn. Rules Part 7045.0131, subp. 8 (1984)

Wastes from nonspecific sources per Minn. Rules Parts 7045.0135 (1984).

EPA
HAZARDOUS
WASTE #

HAZARDOUS WASTE DESCRIPTION

- F001 The following spent halogenated solvents used in degreasing: tetrachloroethylene, trichloroethylene, methylene chloride, 1,1,1-trichloroethane, carbon tetrachloride, and chlorinated fluorocarbons, and sludges from the recovery of these solvents in degreasing operations.
- F002 The following spent halogenated solvents: tetrachloroethylene, methylene chloride, trichloroethylene, 1,1,1-trichloroethane, chlorobenzene, 1,1,2-trichloro-1,2,2-trifluoroethane, orthodichlorobenzene, and trichlorofluoromethane, and the still bottoms from the recovery of these solvents.
- F006 Waste water treatment sludges from electroplating operations except from the following processes:
1. Sulfuric acid anodizing of aluminum;
 2. Tin plating on carbon steel;
 3. Zinc plating (segregated basis) on carbon steel;
 4. Aluminum or zinc-aluminum plating on carbon steel;
 5. Cleaning/stripping associated with tin, zinc and aluminum plating on carbon steel; and
 6. Chemical etching and milling of aluminum.

Waste from commercial chemical products per Minn. Rules Part 7045.0135 (1984).

- P030 Wastes containing cyanides (soluble cyanide salts), not elsewhere specified.

PCB Wastes

- MN03 Wastes containing organic compounds known as polychlorinated biphenyls (PCB) at concentrations of 50 parts per million or greater per Minn. Rules Part 7045.0135, subp. 5 (1984).

2. Condition of containers. Containers used to store hazardous waste must meet the following requirements:

a. Be of sturdy leak-proof construction, adequate wall thickness, adequate weld, hinge, and seam strength and sufficient strength to withstand side and bottom shock, while filled, without impairment of the ability of the container to fully contain the hazardous waste; and

b. Have lids, caps, hinges, or other closure devices of sufficient strength and construction so that when closed they will withstand dropping, overturning, or other shock without impairment of the container's ability to fully contain the hazardous waste.

If a container holding hazardous waste does not meet the requirements of items a and b or if it begins to leak, the Permittee shall transfer the hazardous waste from the container to a container that does meet the requirements of items a and b, or manage the waste in some other way that complies with the requirements of Minn. Rules Part 7045.0526.

3. Compatibility of waste with containers. The Permittee shall use a container made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored and other substances that the container may foreseeably contact, so that the ability of the container to contain the waste is not impaired.

4. Management of containers.

a. A container holding hazardous waste must always be labeled with the words "Hazardous Waste" and kept closed during storage, except when it is necessary to add or remove waste.

b. A container holding hazardous waste must not be opened, handled, or stored in a manner which may rupture the container or cause it to leak. Reuse of containers is governed by the United States Department of Transportation regulations, including those set forth in Code of Federal Regulations, Title 49, Section 173.28 (1983).

c. If exposure of the containers to moisture or direct sunlight may create a hazardous condition or adversely affect the container's ability to contain the hazardous waste, the owner or operator must store the containers in an area with overhead roofing or other covering that does not obstruct the visibility of the labels.

L. STORAGE IN TANKS

1. General operating requirements.

The Permittee shall not place hazardous waste or other materials that are incompatible with the material of the construction of the secondary containment tank unless the tank is protected from accelerated corrosion, erosion, or abrasion through the use of an inner liner or coating which is compatible with the waste or material and which is free of leaks, cracks, holes, or other deterioration; or an alternate means of protection such as cathodic protection, or corrosion inhibitors.

The Permittee must use appropriate controls and practices to prevent overfilling such as waste feed cutoff systems, or by-pass systems to a standby tank, and for uncovered tanks, maintenance of sufficient freeboard to prevent overtopping by wave or wind action or by precipitation.

Each tank must be labeled with the words "Hazardous Waste" in a legible and conspicuous manner. The words "Hazardous Waste" must be plainly visible and legible to any person who may operate any outlet valve.

2. Design of tanks.

a. Corroded or damaged secondary containment tanks shall not be used to contain hazardous waste. Tanks that must be lined for protection from corrosion, erosion or abrasion by the hazardous waste and that have corroded or damaged liners shall not be used to contain hazardous waste in the event of an emergency.

b. Valves, pipes, fittings, or other closure devices and appurtenances shall be of sufficient strength to withstand shock and internal pressure without impairment of the ability of the tank to fully contain the waste. Gasketed closures shall be fitted with gaskets comprised of material that is sufficient to prevent leakage and that will not be deteriorated by the contents.

M. CLOSURE

1. Performance Standard. The Permittee shall close the facility in accordance with the closure plan set forth in Attachment IV.

2. Amendment to Closure Plan. The Permittee shall amend the closure plan in accordance with Minn. Rules Part 7045.0486, subpart 4. The Permittee may amend the closure plan at any time

during the active life of the facility. The active life of the facility is that period during which wastes are periodically received, treated or stored at the facility. The Permittee shall amend the plan whenever changes in operating plans or facility design affect the closure plan and whenever there is a change in the expected year of closure. When the Permittee requests a permit modification to authorize a change in operating plans or facility design, the Permittee shall request a modification of the closure plan at the same time. If a permit modification is not needed to authorize the change in operating plans or facility design, the request for modification of the closure plan must be made within 60 days after the change.

3. Notification of Closure. The Permittee shall notify the Director at least 180 days prior to the expected date of commencement of closure. The written notice shall include:

- a. The anticipated last day of operation;
- b. The existing inventory count and inventory reduction schedule; and
- c. A discussion of how conditions of this permit will be met.

4. Time Allowed for Closure. After receiving the final volume of hazardous waste, the Permittee shall treat or remove all hazardous waste from the site in accordance with the schedule in the closure plan set forth in Attachment IV. The Permittee shall complete closure in accordance with the closure plan and by Minn. Rules Part 7045.0488.

5. Disposal or Decontamination of Equipment. When closure is completed, all equipment, structures, and any other part of the facility which has been contaminated by hazardous waste or residues must be properly disposed of or decontaminated by removing all hazardous wastes and residues.

6. Certification of Closure. When closure is completed, the Permittee shall submit to the Director certification by the Permittee and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan set forth in Attachment IV, and any modifications or amendments thereto.

7. Cost estimate for facility closure. The Permittee's original closure cost estimate is set forth in Attachment IV.

- a. In accordance with Minn. Rules Part 7045.0502, subp. 2, the Permittee must adjust the closure cost estimate for inflation within 30 days after each anniversary of the date on which the first closure cost estimate was prepared.

b. The Permittee must revise the closure cost estimate whenever a change in the closure plan increases the cost of closure.

c. The Permittee must keep at the facility a copy of the latest closure cost estimate and, when this estimate is adjusted in accordance with Part b above, the latest adjusted closure cost estimate.

8. Financial assurance for facility closure. The Permittee shall comply with Minn. Rules Part 7045.0504 by providing documentation of financial assurance in at least the amount of the cost estimates required by Part VI.M(7). Changes in any financial assurance mechanism must be approved by the Director, prior to any changes being made.

9. Closure for container storage facilities. At closure, all hazardous waste and hazardous waste residues must be removed from the containment system. Remaining containers, liners, bases, and soil containing or contaminated with hazardous waste or hazardous waste residues must be decontaminated or removed. At closure and throughout the operating period, unless the Permittee can demonstrate that the waste removed from the containment system is not a hazardous waste, the Permittee becomes a generator of hazardous waste and shall manage it in accordance with all applicable requirements of Minn. Rules Parts 7045.0205 to 7045.1030.

10. Closure of tanks. At closure, all hazardous waste and hazardous residues must be removed from the emergency secondary containment tanks, discharge control equipment, discharge confinement structures, and the containment system. Remaining liners, bases, and soil containing or contaminated with hazardous waste or hazardous waste residues must be decontaminated or removed. The Permittee shall close the facility in accordance with the closure plan as set forth in Attachment IV.

PART VI

SECURITY, SAFETY AND EMERGENCY PROCEDURES

A. SECURITY

The Permittee shall control access to the facility by the use of fences, gates, locks, and other similar methods and allow access only to persons who are authorized by the Permittee and, if necessary, who are knowledgeable in the safety and emergency procedures needed for handling the hazardous waste. The Permittee shall provide security against unauthorized entry onto the site, in accordance with Minn. Rules Part 7045.0452, subp. 4.

B. PREPAREDNESS AND PREVENTION

1. Required Equipment. At a minimum the Permittee shall maintain at the facility the emergency equipment required by the contingency plan set forth in Attachment III.

2. Testing and Maintenance of Equipment. The Permittee shall test and maintain all facility communications or alarm systems, fire protection equipment, spill control equipment to ensure proper operation in time of emergency. The maintenance and inspection of equipment shall be conducted in accordance with the Inspection Plan set forth in Attachment V.

3. Access to Communications or Alarm System. The Permittee shall ensure that, whenever hazardous waste is being poured, mixed, spread, or otherwise handled, all personnel involved in the operation shall have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee.

4. Aisle Space. The Permittee shall maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency.

C. CONTINGENCY PLAN

1. Implementation of Plan. Whenever there is a fire, explosion, or release of hazardous waste or hazardous constituents which threatens or could threaten human health or the environment, the Permittee shall immediately carry out the provisions of the contingency plan set forth in Attachment III. and shall follow the emergency procedures required by Minn. Rules Part 7045.0468.

2. Copies of Contingency Plan. A copy of the contingency plan and all revisions to the plan must be submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.

3. Amendments to Plan. The contingency plan must be reviewed and immediately amended, if necessary, whenever:

- a. this facility permit is revised;
- b. the plan fails in an emergency;

- c. the facility changes in its design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;
- d. the list of emergency coordinators changes; or
- e. the list of emergency equipment changes.

D. EMERGENCY PROCEDURES

The Permittee must at all times have at least one employee either on the facility premises or on-call, with the responsibility for coordinating all emergency response measures. The emergency coordinator must be thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location(s) and characteristics of waste handled, the location of all records within the facility, and the facility layout. The emergency coordinator must also have the authority to commit the resources needed to carry out the contingency plan.

E. POST EMERGENCY REQUIREMENTS

Immediately after an emergency, the emergency coordinator shall provide for treating, storing, or disposing of recovered waste, contaminated soil or water, or any other material that results from a release, fire, or explosion at the facility pursuant to the contingency plan set forth in Attachment III.

PART VII

GENERAL CONDITIONS

A. DUTY TO COMPLY

The Permittee shall perform the actions or conduct the activity authorized by this permit in accordance with the plans and specifications approved by the agency and in compliance with the conditions of the permit, except as provided in subpart L of this Part in this permit.

B. FALSE STATEMENTS

The Permittee shall not knowingly make a false or misleading statement, representation, or certification in a record, report, plan, or other document required to be submitted to the agency or

to the Director by this permit. The Permittee shall immediately upon discovery report to the Director an error or omission in these records, reports, plans, or other documents.

C. DUTY TO PROVIDE INFORMATION

The Permittee shall, when requested by the Director, submit within a reasonable time the information and reports that are relevant to the control of pollution regarding the construction, modification, or operation of the facility covered by this permit or regarding the conduct of the activity covered by this permit in accordance with Minn. Stat. § 115.04.

D. INSPECTION AND ENTRY

When authorized by Minnesota Statutes, sections 115.04; 115B.17, subdivision 4; or 116.091, and upon presentation of proper credentials, the agency, or an authorized employee or agent of the agency, shall be allowed by the Permittee to enter at reasonable times upon the property of the Permittee to examine and copy books, papers, records, or memoranda pertaining to the construction, modification, or operation of the facility covered by this permit or pertaining to the activity covered by this permit.

E. DUTY TO MITIGATE

If the Permittee discovers, through any means, including notification by the agency, that noncompliance with a condition of the permit has occurred, the Permittee shall take all reasonable steps to minimize the adverse impacts on human health, public drinking water supplies, or the environment resulting from the noncompliance.

F. LIABILITY REQUIREMENTS

The Permittee shall have and maintain liability coverage for sudden and accidental occurrences in the amount of at least One Million Dollars per occurrence with an annual aggregate of at least Two Million Dollars, exclusive of legal defense costs in accordance with the requirements of Minn. Rules Part 7045.0518.

G. INCAPACITY OF OWNERS OR OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS

1. Notification of Bankruptcy. The Permittee shall notify the Director by certified mail of the commencement of a voluntary or involuntary proceeding under United States Code, Title 11, Bankruptcy, naming the Permittee as debtor, within ten days after commencement of the proceeding. A guarantor of a corporate

guarantee as specified in Minn. Rules Parts 7045.0504, subp. 7; 7045.0508, subp. 7; and 7045.0514, subp. 7 shall make the notification if the Permittee is named as debtor, as required under the terms of the corporate guarantee.

2. Incapacity of Financial Institutions. the Permittee who fulfills the requirements of Minn. Rules Parts 7045.0504, 7045.0508, 7045.0514, or 7045.0518 by obtaining a trust fund, surety bond, letter of credit, or insurance policy will be deemed to be without the required financial assurance or liability coverage in the event of bankruptcy of the trustee or issuing institution, or a suspension or revocation of the authority of the trustee institution to act as trustee or of the institution issuing the surety bond, letter of credit, or insurance policy to issue these instruments. The Permittee shall establish other financial assurance or liability coverage within 60 days after such an event.

The Sperry Corporation successfully demonstrates financial assurance coverage by means of the Financial Test Mechanism per Minn. Rules Part 7045.0504, subp. 7 (1984).

H. MODIFICATION, REVOCATION AND REISSUANCE, AND REVOCATION

This permit may be modified, revoked and reissued, or revoked without reissuance for cause as specified in Minn. Rules Parts 7001.0170 - 7001.0190 and Minn. Rules Part 7001.0730. The filing of a request for a permit modification, revocation and reissuance, or revocation without reissuance or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition.

I. REISSUANCE OF PERMIT

If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee shall submit a complete application for reissuance of the permit at least 180 calendar days before this permit expires, unless written permission for a later date has been granted by the Director. If the Director determines that more than 180 days will be required to complete the review of an application for reissuance of a permit, the Director shall notify the Permittee of his determination at least 60 days prior to the date upon which the Director determines the complete application must be submitted. The Permittee shall submit the completed application for reissuance on the date established by the Director.

J. CONTINUATION OF EXPIRED PERMIT

This permit will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely and complete application for reissuance of the permit provided that the Director determines, based on available information, that both of the following are true:

1. the Permittee is in compliance with the terms and conditions of the expired permit; and
2. the agency, through no fault of the Permittee, has not taken final action on the application before the expiration date of this permit.

K. TRANSFER OF PERMITS

This permit is not transferable to any person without the express written approval of the agency after compliance with the requirements of Minn. Rules Part 7001.0190. A person to whom the permit has been transferred shall comply with the conditions of this permit.

L. EMERGENCY PERMIT

The Permittee need not comply with the conditions of this permit to the extent and for the duration that noncompliance is authorized in an emergency permit in accordance with Minn. Rules Part 7001.0690.

M. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.